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FINAL FINDING OF SUITABILITY (FOST) TO TRANSFER # 2 FOR SOUTHERN PARCELS 4-8, 10-12, 14, AND 42 AND PARCELS 25, 26, 30-33, 37, AND PORTIONS OF 40 AND 41 (PUBLIC DOCUMENT)

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FINDING OF SUITABILITY TO TRANSFER FOR SOUTHERN PARCELS 4–8, 10–12, 14, AND 42 AND PARCELS 25, 26, 30–33, 37, AND PORTIONS OF 40 AND 41 MARINE CORPS AIR STATION TUSTIN, CALIFORNIA

28 SEPTEMBER 2001

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ACRONYMS/ABBREVIATIONS

ACM	asbestos-containing material
AHERA	Asbestos Hazard Emergency Response Act
AOC	area of concern
AST	aboveground storage tank
BCT	BRAC Cleanup Team
BNI	Bechtel National, Inc.
BRAC	base realignment and closure
Cal-EPA	California Environmental Protection Agency
CEC	California Education Code
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CO	carve out
COC	chemical of concern
DDD	dichlorodiphenyldichloroethane
DDE	dichlorodiphenyldichloroethene
DDT	dichlorodiphenyltrichloroethane
DoD	(United States) Department of Defense
DON	(United States) Department of the Navy
DTSC	(Cal-EPA) Department of Toxic Substances Control
EBS	environmental baseline survey
EIR	environmental impact report
EIS	environmental impact statement
ESI	expanded site inspection
FAD	friable, accessible, or damaged
FEMA	Federal Emergency Management Agency
FFSRA	Federal Facility Site Remediation Agreement
FOSL	finding of suitability to lease
FOST	finding of suitability to transfer
FS	feasibility study
HUD	Housing and Urban Development
IRP	Installation Restoration Program
LBP	lead-based paint
LIFOC	lease in furtherance of conveyance

ACRONYMS/ABBREVIATIONS (continued)

MCAS	Marine Corps Air Station
MCL	maximum contaminant level
MOA	memorandum of agreement
NEPA	National Environmental Policy Act
NFA	no further action
OU	operable unit
PA	preliminary assessment
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PEA	preliminary environmental assessment
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
RI	remedial investigation
ROD	record of decision
SHPO	state historic preservation officer
TCE	trichloroethylene
TSCA	Toxic Substances Control Act
U.S. EPA	United States Environmental Protection Agency
UST	underground storage tank
VOC	volatile organic compound

FINDING OF SUITABILITY TO TRANSFER FOR SOUTHERN PARCELS 4–8, 10–12, 14, AND 42 AND PARCELS 25, 26, 30–33, 37, AND PORTIONS OF 40 AND 41 MARINE CORPS AIR STATION TUSTIN, CALIFORNIA

1.0 PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the conclusion that real property made available through the base realignment and closure (BRAC) process is environmentally suitable to transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Nineteen parcels, consisting of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, portions of 40 and 41, and 42, at Marine Corps Air Station (MCAS) Tustin are proposed for transfer. Portions ("carve-out [CO] areas") of Parcels 6, 7, 8, 11, 12, 40, and 42 are withheld from conveyance at this time due to the ongoing cleanup of impacted groundwater beneath these areas (Installation Restoration Program [IRP] Sites 5S(b), 6, and 8) and the ongoing evaluation of arsenic-impacted soil within Parcels 12 and 40 (the Arsenic Area of Concern [AOC]). These CO areas are referred to as "CO-1" (IRP-5S(b)), "CO-2" (IRP-6 and buffer zone), "CO-3" (IRP-8 and buffer zone), and "CO-4" (Arsenic AOC). The CO areas include buffer zones to allow for the protection of human health during ongoing cleanup and investigation activities.

A Finding of Suitability to Lease (FOSL) is being prepared concurrently with this FOST to support a Lease in Furtherance of Conveyance (LIFOC) for the CO areas. The LIFOC will establish lease restrictions to allow use of property without impeding the cleanup and to prevent human exposure to potential contaminants while remedial action is being completed.

This FOST, including tables and figures, is based on the final Basewide Environmental Baseline Survey (EBS) Report for MCAS Tustin (BNI 2001) as well as information contained in the documents listed in Attachment 1. These documents include the final MCAS Tustin Business Plan (DON 2001a), which provides updated information through 31 December 2000 and schedules for planned environmental activities at the base. Parcel designations match those presented in the EBS Report and are consistent with those presented in the final MCAS Tustin Specific Plan/Reuse Plan Errata (Reuse Plan) (City of Tustin 1998).

This FOST was prepared in accordance with United States Department of Defense (DoD) guidance documents, including DoD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer for Property Where Release or Disposal Has Occurred (DoD 1994a). The MCAS Tustin environmental documents are available from the information repository located within the government document section of the main library of the University of California at Irvine.

2.0 PROPERTY DESCRIPTION

MCAS Tustin is located in southern California near the center of Orange County (Figure 1). The installation is located in a residential and light industrial/manufacturing area approximately 40 miles south of downtown Los Angeles and approximately 100 miles north of the California-Mexico border. It encompasses approximately 1,600 acres of land. Most of the base is located within the city of Tustin; approximately 95 acres in the southern portion of the base are within the city of Irvine. The transfer parcels in this FOST are located in the city of Tustin. The base is bordered by the cities of Tustin, Irvine, and Santa Ana.

MCAS Tustin was commissioned in 1942 as a United States Department of the Navy (DON) lighter-than-air base. The installation was used to support observation blimps and personnel conducting antisubmarine patrols off the coast of southern California during World War II. In 1949, the base was officially decommissioned as an active facility because of the diminished need for blimp patrols. However, in 1951 the base was reactivated to support helicopter operations for the Korean conflict and was renamed "MCAS (Helicopter) Santa Ana." In 1978, the installation name was changed to "MCAS (H) Tustin" to reflect its annexation by the city of Tustin. In 1986, the installation was renamed "MCAS Tustin."

MCAS Tustin was operationally closed on 02 July 1999 in accordance with the Defense Base Closure and Realignment Act of 1990. Currently, the majority of the buildings are unoccupied, and the primary activities at the base are maintenance and environmental cleanup.

The locations of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, 40, 41, and 42 are depicted on Figure 2. Parcels 40 and 41 represent the portions of the circulation and drainage facilities, respectively, that are included in the transfer property. These parcels and portions of parcels consist of approximately 505 acres. Of these 505 acres, approximately 17 acres have been carved out of the transfer parcels for LIFOC, leaving 488 acres for transfer. The portions of Parcels 6, 7, 8, 11, 12, 40, and 42 that have been carved out for LIFOC are also shown on Figure 2. CO-1 is about 1 acre, CO-2 is about 6 acres, CO-3 is about 4 acres, and CO-4 is about 6 acres.

Parcel descriptions and boundaries are described below in Sections 2.1 through 2.19. Buildings and structures (e.g., concrete pads, washracks, and sewer lift stations) located within the transfer parcels are shown on Figures 3, 4, and 5 and described in Table 1. Locations of former AOCs within the transfer parcel boundaries are shown on Figure 6, and descriptions and regulatory status for the AOCs are presented in Table 2. Locations of underground storage tank (UST) and aboveground storage tank (AST) sites formerly located on the transfer parcels are shown on Figure 7, and descriptions and regulatory status are

presented in Table 3. Some buildings/structures, AOCs, and UST/AST sites are located on several parcels.

2.1 Parcel 4

Parcel 4 (Figure 2) consists of about 10 acres located in the southwestern corner of MCAS Tustin. The parcel is bordered by Parcel 40 to the north, Parcel 5 to the east, Parcel 6 to the south, and Parcel 40 to the west.

Seven AOCs (AST-03A [aerial photograph, storage, possible aboveground tank], ST-03, ST-4A, ST-4B, ST-5A, ST-5B, and ST-78) are located within the boundaries of Parcel 4 (Figure 6). Regulatory concurrence for no further action (NFA) has been received for all of the AOCs (Table 2). No UST/AST site was located within the boundaries of Parcel 4.

Four buildings (176, 527, 531, and 532) and four structures (237, 571, 572, and 601) are located within the boundaries of Parcel 4 (Figure 3). These buildings/structures are no longer in use and are scheduled for demolition after transfer.

It is anticipated that Parcel 4 will be transferred for commercial/business use.

2.2 Parcel 5

Parcel 5 (Figure 2) consists of about 23 acres located in the southwestern corner of MCAS Tustin. The parcel is bordered by Parcel 40 to the north and east, Parcel 6 to the south, and Parcel 4 to the west.

Five AOCs (AST-02 [aerial photograph, storage, possible aboveground tank], MWA-02, ST-6, ST-91, and TOW-02) are located within the boundaries of Parcel 5 (Figure 6). ST-91 (Building 525) is partially located on Parcel 40. Regulatory concurrence for NFA has been received for all of the AOCs (Table 2). One former UST site (UST-536) was located within the boundaries of Parcel 5 (Figure 7), and regulatory concurrence for NFA at the site has been received (Table 3). No AST was located within the boundaries of Parcel 5.

Two buildings (525 and 536) and one structure (535) are located within the boundaries of Parcel 5 (Figure 3). Building 525 is partially located on Parcel 40. Buildings 525 and 536 are vacant, and, along with Structure 535, are scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 5 will be transferred for commercial/business use.

2.3 Parcel 6

Parcel 6 (Figure 2) consists of about 77 acres and is located in the southwestern corner of MCAS Tustin. The parcel is bordered by Parcels 4 and 5 to the north, Parcels 40 and 7 to the east, Parcel 41 and Barranca Channel to the south, and Parcel 40 to the west. An area on the southeastern side (CO-3) has been carved out for LIFOC (Figure 2).

Two AOCs (AD-07 and AST-03B [aerial photograph, storage, possible aboveground tank]) are located within the boundaries of Parcel 6 (Figure 6). Regulatory concurrence for NFA has been received for both AOCs (Table 2). No UST/AST site was located on Parcel 6.

Parcel 6 was primarily used for crop cultivation, and no building or structure is located on the property (Figure 3). The northern portion of Parcel 6 contained a staging area where produce was collected and prepared for transport. Agricultural equipment was also stored in this area (BNI 1997a).

It is anticipated that Parcel 6 will be transferred for commercial/business use.

2.4 Parcel 7

Parcel 7 (Figure 2) consists of about 8 acres located in the southwestern corner of MCAS Tustin. The parcel is bordered by Parcel 6 to the north and west, Parcel 40 to the east, and Parcel 41 and Barranca Channel to the south. An area on the eastern side (CO-3) has been carved out for LIFOC (Figure 2).

Four AOCs (MGR-01, MWA-01, ST-2, and TOW-01) are located within the boundaries of Parcel 7 (Figure 6). Regulatory concurrence for NFA has been received for all of the AOCs (Table 2). Two former UST sites (UST-530A and UST-530B) were located on Parcel 7 (Figure 7), and regulatory concurrence for NFA has been received for both sites (Table 3). No AST was located within the boundaries of Parcel 7.

Three buildings (528, 529, and 530) and three structures (566, 610, and 611) are located within the boundaries of Parcel 7 (Figure 3). The three buildings are proposed for reuse after transfer, and the three structures are scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 7 will be transferred for commercial/business use.

2.5 Parcel 8

Parcel 8 (Figure 2) consists of about 51 acres located in the southwestern portion of MCAS Tustin. The parcel is bordered by Parcel 40 to the north, east, and west, and Parcel 41 and Barranca Channel to the south. An area on the western side (CO-3) has been carved out for LIFOC (Figure 2). The western edge of Parcel 8 was formerly used for agricultural purposes.

Four AOCs (MAW-06, MFL-1B, MMS-02, and ST-68) are located within the boundaries of Parcel 8 (Figure 6). MAW-06, an agricultural well, was listed as an AOC; however, it has been removed from consideration by the BCT (Table 2). AOCs MFL-1B, MMS-02, and ST-68 have received regulatory concurrence for NFA (Table 2).

Two former AST sites (AST-198A and AST-198B) are located within the boundaries of Parcel 8 (Figure 7). Regulatory concurrence for NFA has been

received for both sites (Table 3). No UST site is located within the boundaries of Parcel 8.

One building (255) is located within the boundaries of Parcel 8 (Figure 3). This building is no longer in use and scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 8 will be transferred for commercial/business use.

2.6 Parcel 10

Parcel 10 (Figure 2) consists of about 16 acres located in the southern portion of MCAS Tustin. The parcel is bordered by Parcel 40 to the north and west, Parcel 11 to the east, and Parcel 9 to the south.

Fourteen AOCs (AD-04, AD-06, MAE-01, MWA-05, MWA-21, ST-25, ST-26A, ST-26B, ST-27, ST-28A, ST-76, ST-89, TOW-06, and TOW-19) are located within the boundaries of Parcel 10 (Figure 6). Regulatory concurrence for NFA has been received for all of the AOCs (Table 2).

One former UST site (UST-508) and one former AST site (AST-537) are located within the boundaries of Parcel 10 (Figure 7). Regulatory concurrence for NFA has been received for both sites (Table 3).

Three buildings (508, 520, and 537) and three structures (517, 581, and 599) are located within the boundaries of Parcel 10 (Figure 3). Building 537 is also partially located on Parcels 12 and 40. The buildings/structures on Parcel 10 are no longer in use. With the exception of Building 520 (proposed for reuse), the buildings/structures located on Parcel 10 are scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 10 will be transferred for commercial/business use.

2.7 Parcel 11

Parcel 11 (Figure 2) consists of about 38 acres located in the southern portion of MCAS Tustin. The parcel is bordered by Parcel 40 to the north, Parcel 42 to the east, Barranca Parkway to the south, and Parcels 9 and 10 to the west. An area on the northern side (CO-2) has been carved out for LIFOC (Figure 2). The southern portion of Parcel 11 is vacant land, and the northern portion consists of a paved parking area and vacant land.

One AOC (SAT-14) is located within the boundaries of Parcel 11 (Figure 6). SAT-14 received regulatory concurrence for NFA (Table 2). No UST or AST site is located within the boundaries of Parcel 11.

One building (568) and one structure (595) are located within the boundaries of Parcel 11 (Figure 3). Both are no longer in use and scheduled for demolition after transfer (Table 1). Building 568 is also partially located on Parcels 12 and 40.

It is anticipated that Parcel 11 will be transferred for commercial/business use.

2.8 Parcel 12

Parcel 12 (Figure 2) consists of about 28 acres located in the southern portion of MCAS Tustin. The parcel is bordered on all sides by Parcel 40. Three portions of the parcel (CO-1, CO-2, and CO-4) have been carved out for LIFOC (Figure 2).

Seventeen AOCs (AMS-03, DSD-03, MAE-02, MAE-07, MWA-10, MWA-11 [A and B], ST-11A, ST-11B, ST-28B, ST-34A, ST-34B, ST-69, ST-74, TOW-09A, TOW-09B, TOW-09C, and TOW-10) are located within the boundaries of Parcel 12 (Figure 6). AMS-3 is partially located on Parcel 40. Regulatory concurrence for NFA has been received for all of the AOCs (Table 2).

One former UST site (UST-273) and two former AST sites (AST-273A and AST-273B) are located within the boundaries of Parcel 12 (Figure 7). Regulatory concurrence for NFA has been received for these sites (Table 3).

Seven buildings (220, 273, 537, 544, 545, 546, and 568) and six structures (205, 231, 559, 565, 586, and 591) are located within the boundaries of Parcel 12 (Figure 3). Building 537 is also partially located on Parcels 10 and 40, and Building 568 is partially located on Parcels 11 and 40. Structure 231 is partially located on Parcel 40. The buildings/structures located on Parcel 12 are no longer in use. The ultimate disposition of Building 220 has not been decided. With the exception of Structure 231 and Buildings 273 and 546 (all proposed for reuse), the remaining buildings/structures are scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 12 will be transferred for commercial/business use.

2.9 Parcel 14

Parcel 14 (Figure 2) consists of about 44 acres located in the southwestern portion of MCAS Tustin. The parcel is bordered on all sides by Parcel 40.

Two AOCs (MWA-19 and TOW-17) are located within the boundaries of Parcel 14 (Figure 6). Regulatory concurrence for NFA has been received for both AOCs (Table 2).

One former UST site (UST-543) is located within the boundaries of Parcel 14 (Figure 7), and regulatory concurrence for NFA has been received for the site (Table 3). No AST site is located on the parcel.

One unused structure (543) is located on the parcel (Figure 3) and is scheduled for demolition after transfer (Table 1).

It is anticipated that Parcel 14 will be transferred for commercial/business use.

2.10 Parcel 25

Parcel 25 (Figure 2) consists of about 21 acres located in the northern portion of MCAS Tustin. The parcel is bordered on all sides by Parcel 40. Parcel 25 was formerly used for agricultural purposes.

No AOC, or UST/AST site is located on Parcel 25.

Two structures (604 and 605) are located within the boundaries of Parcel 25 (Figure 4). These structures are no longer in use and are scheduled for demolition after transfer.

It is anticipated that Parcel 25 will be transferred for commercial/business use.

2.11 Parcel 26

Parcel 26 (Figure 2) consists of about 62 acres located in the northern portion of MCAS Tustin. The parcel is bordered by Parcels 40 and 41 to the north, Parcels 32 and 40 to the east, and Parcel 40 to the south and west.

Parcel 26 is unoccupied and was formerly used for agricultural purposes. No building, structure, AOC, or UST/AST site is located within the boundaries of the parcel (Figure 4).

It is anticipated that Parcel 26 will be transferred for residential use.

2.12 Parcel 30

Parcel 30 (Figure 2) consists of about 5 acres located in the eastern central portion of MCAS Tustin. The parcel is bordered by Parcel 29 to the north and east, Parcel 31 to the south, and Parcel 40 to the west.

Parcel 30 was formerly used for agricultural purposes. No building, structure, AOC, or UST/AST site is located within the boundaries of the parcel (Figure 5).

It is anticipated that Parcel 30 will be transferred for residential use.

2.13 Parcel 31

Parcel 31 (Figure 2) consists of about 10 acres located in the eastern central portion of MCAS Tustin. The parcel is bordered by Parcels 29 and 30 to the north, Parcel 29 to the east, off-base commercial/office buildings and industrial buildings to the south, and Parcel 40 to the west.

Parcel 31 was formerly used for agricultural purposes. No building, structure, AOC, or UST or AST site is located within the boundaries of the parcel (Figure 5).

It is anticipated that Parcel 31 will be transferred for a kindergarten through sixth grade school.

2.14 Parcel 32

Parcel 32 (Figure 2) consists of about 5 acres located in the northern portion of the MCAS Tustin. The parcel is bordered by Parcel 26 to the north and west, and Parcel 40 to the east and south.

One AOC (AMS-05) is located within the boundaries of Parcel 32 (Figure 6). AMS-05 is also partially located on Parcel 40. Regulatory concurrence for NFA has been received for the AOC (Table 2). No UST/AST site is located on the property.

Parcel 32 was formerly used for agricultural purposes. No building or structure is located within the boundaries of the parcel (Figure 4).

It is anticipated that Parcel 32 will be transferred for residential use.

2.15 Parcel 33

Parcel 33 (Figure 2) consists of about 25 acres located in the northeastern corner of MCAS Tustin. The parcel is bordered by a railway and light industrial parks to the north, Harvard Avenue to the east, Edinger Avenue to the south, and Parcel 41 to the west.

Parcel 33 was formerly used for agricultural purposes. In 1942, DON acquired the parcel from The Irvine Company. In 1982, DON transferred the parcel back to The Irvine Company, who then transferred it to the county of Orange. In 1992, DON reacquired the land from the county of Orange for development of a family housing project (JEG 1994). Since that time, the parcel has not been farmed, and pesticides and herbicides have not been applied to the property (BNI 2001). This area was not developed because base closure was scheduled. In the interim, Osumi Farms periodically plowed the property for weed control (BNI 1997a).

No building, structure, AOC, or UST site is located within the boundaries of the parcel. One former AST site (AST-24C) is located on Parcel 33 (Figure 7). Regulatory concurrence for NFA has been received for the site (Table 3).

It is anticipated that Parcel 33 will be transferred for residential use.

2.16 Parcel 37

Parcel 37 (Figure 2) consists of about 45 acres located in the City of Irvine, in the southeastern portion of MCAS Tustin. The parcel is bordered by vacant off-base property and Warner Avenue to the north, Harvard Avenue to the east, Parcels 38 and 39 to the south, and Peters Canyon Channel to the west.

No AOC, or UST/AST site is located within the boundaries of Parcel 37.

Structure 6857 and the Marble Mountain Park housing community are located within the boundaries of Parcel 37 (Figure 5). Structure 6857 is a sewer lift station and is proposed for demolition after transfer (Table 1). The Marble Mountain Park housing community consists of 80 three-, four-, six-, and eight-unit residential buildings constructed in 1984 and 1989. The Marble Mountain Park buildings are vacant and their ultimate disposition has not yet been determined.

It is anticipated that Parcel 37 will be transferred for residential use.

2.17 Parcel 40 (Portions)

The portions of Parcel 40 available for transfer consist of about 30 acres of proposed circulation facilities (e.g., roadways and intersections) located in the

southern and northern portions of MCAS Tustin (Figure 2). Some areas of Parcel 40 have been carved out (CO-1, CO-2, CO-3, and CO-4) for LIFOC (Figure 2).

Eleven AOCs (AMS-03, AMS-05, MWA-06, ST-29, ST-30, ST-32A, ST-32B, ST-32C, ST-33, ST-91, and TOW-07) are located within the boundaries of Parcel 40 (Figure 6). AMS-03, AMS-05, MWA-6, and ST-91 are partially located on other parcels. Regulatory concurrence for NFA has been received for all of the AOCs (Table 2).

One former UST site (UST-181) is located within the boundaries of the transfer portions of Parcel 40 (Figure 7). The UST site is also partially located in Parcel 15. Regulatory concurrence for NFA at the site has been received (Table 3). No AST sites are located on the Parcel 40 transfer portions of this FOST.

Eight buildings (180, 181, 182, 244, 525, 537, 551, and 568) and five structures (229, 231, 583, 598, and 606) are located within the boundaries of Parcel 40 (Figures 3 and 4). Building/structures 182, 229, 231, 525, 537, and 568 are partially located on other parcels (Table 1). These buildings/structures are no longer in use and, with the exception of Structure 231 (proposed for reuse), are scheduled for demolition.

It is anticipated that these portions of Parcel 40 will be transferred for circulation facilities.

2.18 Parcel 41 (Portions)

The portions of Parcel 41 to be transferred consist of drainage facilities and include about 5 acres located in the southwestern and northeastern portions of MCAS Tustin (Figure 2).

This parcel consists of drainage facilities along the southern side of Parcels 6, 7, 8, 9, and 40 and along the western side of Parcel 33. No building, structure, AOC, or UST/AST site is located within the boundaries of Parcel 41 (Figure 3).

It is anticipated that the southern portion of Parcel 41 will be transferred for use as Barranca Channel and the northern portion will be transferred for Peters Canyon Channel. The Orange County Flood Control District currently has easements for both channels.

2.19 Parcel 42

Parcel 42 (Figure 2) consists of drainage facilities and includes about 2 acres located in the southern portion of MCAS Tustin. The parcel is bordered by Parcel 11 to the north, Parcel 40 to the east, Barranca Parkway to the south, and Parcels 11 and 40 to the west. A small area in the center of the parcel (CO-2) has been carved out for LIFOC (Figure 2).

No structure is located within the boundaries of Parcel 42 (Figure 3). This parcel consists of drainage facilities along the eastern side of Parcel 11. It is anticipated that Parcel 42 will be transferred for storm drain facilities.

3.0 REGULATORY COORDINATION

The environmental restoration and compliance programs at MCAS Tustin have been defined and are being implemented pursuant to the following regulatory mechanisms:

- CERCLA, as amended by the Superfund Amendments and Reauthorization Act and the Community Environmental Response Facilitation Act
- Resource Conservation and Recovery Act (RCRA)
- National Environmental Policy Act (NEPA)
- California Environmental Quality Act (CEQA)
- Petroleum Corrective Action Program
- California Health and Safety Code

MCAS Tustin is not a Superfund site and is not listed on the National Priorities List. A Federal Facility Site Remediation Agreement (FFSRA) between DON and the California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) was signed for MCAS Tustin on 18 August 1999. The FFSRA defines DON's corrective action and response action obligations under RCRA and CERCLA. Since 1993, the BRAC Cleanup Team (BCT) has coordinated cleanup and closure activities at MCAS Tustin. The BCT consists of representatives from DON, the United States Environmental Protection Agency (U.S. EPA), the Santa Ana Regional Water Quality Control Board, and DTSC. These agencies reviewed and commented on the required documents included in Attachment 1. DON is the lead federal agency regarding environmental restoration at MCAS Tustin, and DTSC is the lead regulatory agency providing oversight.

The BRAC Cleanup Plan Guidebook (DoD 1996) provides the BCT with direction to classify base property into one of seven area types in order to facilitate and support reuse and transfer (Table 4). The area types are ranked in order of their suitability to transfer, with Area Types 1 through 4 being defined as suitable for transfer by deed and Area Types 5 and 6 being defined as unsuitable for transfer by deed until all remedial actions have been completed or after the remedy has been demonstrated to be operating properly and successfully. Areas classified as Area Type 7 either are not evaluated or require further evaluation in order to classify them into one of the other area types.

4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE

Potential environmental impacts pertaining to the disposal and reuse of MCAS Tustin were addressed in the final Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) (DON 1999a) and were disclosed to agencies and the public for comment and review in compliance with the

requirements of NEPA and CEQA. The EIS/EIR was prepared through the joint effort of DON (EIS) and the city of Tustin (EIR). DON prepared a NEPA Record of Decision (ROD) to document the selected proposed alternative for reuse at each of the parcels discussed in the EIS/EIR. The NEPA ROD was executed on 02 March 2001 (DON 2001b).

5.0 ENVIRONMENTAL BASELINE SURVEY HISTORY AND FINDINGS

Two EBS Reports have been prepared for MCAS Tustin to describe environmental investigation and closure activities at the base to support reuse. In April 1997, a site-specific EBS Report was issued for Parcels 6, 8B, 8C, 11A, 33, 38, 39, 41A, and 41B (BNI 1997a). This EBS Report described the environmental condition of the parcels and associated rights of way scheduled for transfer with respect to the presence of hazardous substances and petroleum products. Since this report was issued, some of the parcel numbers have been changed.

In 2001 a final Basewide EBS was prepared for MCAS Tustin to describe environmental investigation and closure activities at the base to support reuse (BNI 2001). The Basewide EBS summarizes environmental conditions at the facility and includes information concerning IRP sites, AOCs, USTs, and ASTs. Information concerning asbestos-containing material (ACM), polychlorinated biphenyls (PCBs), and lead-based paint (LBP) surveys conducted at the facility is also included in the Basewide EBS Report.

Three IRP sites and an Arsenic AOC, identified in the final Basewide EBS Report, are located adjacent to the transfer boundaries of Parcels 7, 8, 11, 12, and 40. IRP Sites 5S(b), 6, and 8 are classified as Area Type 5, and the Arsenic AOC is classified as Area Type 7. The three IRP sites are currently being evaluated in a focused feasibility study (FS) for Operable Unit (OU)-4, and the Arsenic AOC is being evaluated under a separate preliminary assessment (PA).

Since investigations and studies are ongoing at these four sites, they are not included in this FOST; the sites have been carved out of the southern parcels transfer area. The CO areas include buffer zones to allow for protection of human health while these investigations and studies are conducted. The four sites will be leased in furtherance of conveyance pending completion of the investigations and determination that the property within the CO area is suitable for transfer.

6.0 ENVIRONMENTAL FINDINGS

To describe the environmental condition of the transfer property relative to the presence of hazardous substances, AOCs and former UST/AST sites have been identified within the 19 parcels being conveyed in this FOST (excluding the CO areas). Figures 6 and 7, respectively, show the locations of AOCs and former UST/AST sites within the transfer parcels. Description and site status information for each AOC and UST/AST site are provided in Tables 2 and 3,

respectively. Figure 10 shows the base parcels along with the contamination plumes associated with each.

All of the AOCs have been assigned Area Types 1 through 4, and all of the UST/AST sites have been assigned Area Type 1 or 2 (Tables 2 and 3). Regulatory NFA concurrence signature pages for all of the AOCs, and UST/AST sites are included in Attachment 2. IRP sites, AOCs, USTs, and ASTs on adjacent parcels were evaluated in conjunction with this FOST, and it was concluded that contamination (e.g., groundwater plumes) from adjacent parcels does not affect the transfer parcels.

Environmental factors considered for the 19 parcels discussed in this FOST are listed in Table 5. Only those factors that require notification or restriction are discussed in this document.

7.0 ENVIRONMENTAL FINDINGS AT ADJACENT SITES

This section discusses IRP sites and one AOC located adjacent to the transfer property boundaries (Figure 8). These sites and adjacent buffer zones have been carved out of the parcels described in this FOST because of the presence of groundwater contamination and arsenic-impacted soil, and associated ongoing investigations. The CO areas cover about 17 acres. They establish buffer zones where lease restrictions can be imposed to prevent human exposure to potential contaminants while remedial action is being evaluated. These areas will be included in a LIFOC. A separate FOSL will be issued to support the LIFOC. IRP Sites 5S(b), 6, and 8 and the Arsenic AOC will be discussed in greater detail in the FOSL.

IRP-5S(b), Drainage Area No. 1 South, consists of an unlined drainage ditch located in the northeastern portion of Parcel 12 (Figure 8). IRP-5S(b) is one of three sites that comprise IRP-5. From 1956 to 1983, the ditch may have received a variety of wastes disposed in floor drains from Buildings 28 and 29 as well as runoff from other potential contaminant source areas. Analytical results from sediment, soil, and surface water sampling at IRP-5S(b) indicated the presence of petroleum hydrocarbons, semivolatile organic compounds, and metals at levels above background in some of the sediment samples. No groundwater contaminants were detected above maximum contaminant levels (MCLs). The draft final Remedial Investigation (RI) Report for OU-1 and OU-2 (BNI 1997b) evaluated IRP-5 under a recreational-use scenario and recommended NFA for IRP-5S(b). However, DON determined that IRP-5 should be further evaluated in a focused FS as part of OU-4 because the property may be used for future residential use. The focused FS for OU-4 is currently in progress and will include a residential-use human-health risk assessment. IRP-5S(b) does not include a buffer zone since there is no further action required for the site.

IRP-6, Paint Locker and Drum Storage Area, operated from 1972 to 1981. Liquid wastes consisting of petroleum hydrocarbons and solvents were reportedly released to soil from drums stored at the site. Soil and groundwater samples

were collected during an expanded site inspection (ESI) (BNI 1996a). Volatile organic compounds (VOCs) were detected in soil and groundwater. On the basis of the soil analytical results, the ESI Report recommended NFA for soil. The groundwater data were evaluated further in the basewide groundwater study presented in the RI Report. The final RI Report recommended NFA (BNI 1997b). Subsequent to the RI, DON determined that IRP-6 should be further evaluated in a focused FS as part of OU-4 to address potential human exposure to VOCs in groundwater at concentrations above the MCLs for drinking water. An evaluation of VOCs in the groundwater at IRP-6 was conducted in early 2000 to determine the extent of the plume. The focused FS for OU-4 is currently in progress and will include the results from this evaluation of VOCs. The IRP-6 buffer zone includes an area downgradient of the IRP site to allow for future monitoring of the groundwater plume.

IRP-8, Drainage Area No. 2, is an area where No. 2 diesel fuel used to supply power generators was reportedly spilled or leaked periodically to a nearby unlined storm drainage ditch from 1976 to 1984. The total quantity of No. 2 diesel fuel potentially spilled at the site is estimated to be between 8,750 and 15,950 gallons. Soil gas, soil, and groundwater samples were collected at the site during the site inspection conducted in 1991. Soil and groundwater samples were collected at IRP-8 during the ESI (BNI 1996a). NFA was recommended for soil at IRP-8. Low concentrations of 1,2-dichloropropane detected in groundwater at IRP-8 were evaluated in the basewide groundwater fate and transport analysis presented in the OU-1 and OU-2 RI Report. NFA was recommended for groundwater at IRP-8 in the RI Report (BNI 1997b). Subsequent to the RI, DON determined that IRP-8 should be further evaluated in the OU-4 focused FS to address potential human exposure to VOCs in groundwater at concentrations above the drinking water MCLs.

The Arsenic AOC was identified during AOC investigations at three AOCs located in the southeast portion of the base. Sampling was conducted at the three AOCs (ST-86, ST-88, and MAE-03) to detect chemicals of concern (COCs) associated with the historical activities conducted at these sites. During the confirmation sampling phase of the remedial actions for these sites, elevated levels of arsenic that exceeded the predetermined arsenic background level were detected in the surface soil. Arsenic is not considered a COC for any of the three sites; therefore, a new AOC (Arsenic AOC) was established to investigate the potential source of the arsenic in the surface soil area. A PA will be conducted for this AOC to determine whether further action is warranted at the site. In addition, a radiological survey of Building 190 is required before property transfer.

IRP-5S(a) was investigated at MCAS Tustin and is one of three drainage ditches which comprise IRP-5. Soil and groundwater samples were collected as part of remedial investigations. Based on the results, no further action was recommended for soil or groundwater; however, since one sample out of nine

samples at IRP-5S(a) had a detection of 6 µg/L trichloroethylene (TCE) in groundwater at one location, IRP-5S(a) was included in the focused FS for OU-4. Based on the limited detection of contaminants and the relatively long distance of 400 feet to the nearest adjacent parcel (Parcel 12), the horizontal extent of any contamination from IRP-5S(a) is estimated to be minimal and not anticipated to impact the adjacent transfer parcels.

IRP-3 was investigated as part of OU-1, which was recently re-designated as OU-1B to expedite cleanup of IRP-13S, which is located in OU-1A. IRP-3 was a former paint stripper disposal area that caused TCE groundwater contamination. Remedial alternatives for the site are currently being evaluated and include groundwater extraction and hydraulic containment. The potential for further migration of the TCE plume to portions of Parcel 40 and possibly Parcel 12 exists; however, the final remedy for IRP-3 will be designed and implemented to prevent further migration and reduce the concentration of TCE in the groundwater to meet the remedial action goals.

8.0 USE RESTRICTIONS AND NOTIFICATIONS

The environmental documents listed in Attachment 1 (References) were evaluated to identify environmental factors that may warrant constraints on certain activities in order to assure that the intended use of the FOST parcels is consistent with protection of human health and the environment. In addition, the environmental factors associated with parcels being transferred for ultimate use as a school site were considered. The factors that require notifications and/or restrictions are discussed below, and summarized in Table 9. See Table 5 for a list of environmental factors considered.

Pursuant to CERCLA Section 120(h)(3)(A)(i) and provisions of 40 Code of Federal Regulations Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the transfer parcels at MCAS Tustin. This notice is provided in Attachment 3.

Attachment 4 contains comments from regulatory agencies and other interested parties with DON's corresponding responses. Among these comments and responses to comments, is DTSC's 19 September 2001 letter stating their final position on this FOST. DON's response to this letter is also included and addresses LBP, UST, and future school sites issues. Unresolved comments are provided in Attachment 5, per FOST policy in the DoD Base Reuse Implementation Manual.

8.1 Notification - Pesticides

Approximately 674 acres of MCAS Tustin were designated for agricultural land or were maintained for weed control, of which about 392 acres were farmed (BNI 2001). Farming was conducted within the base boundary prior to commissioning of the base in 1942 and continued through December 2000. Agricultural areas are located on Parcels 6, 8, 25, 26, and 30 through 33. The primary agricultural areas

are located in the southwestern and northeastern portions of the base. Pesticides and herbicides have previously been applied to these parcels. Osumi Farms provided monthly pesticide and insecticide use reports to Cal-EPA, Department of Pesticide Regulation, regarding pesticides use on this land. Available information concerning commercial pesticides and insecticides used at MCAS Tustin and chemicals injected into irrigation water is in the final EBS Report (BNI 2001).

In 1992, a preliminary endangerment assessment (PEA) was conducted for Parcel 33 (Parcel D). The PEA included soil and groundwater sampling on Parcel D and a health risk assessment for soil contaminants detected at concentrations exceeding screening values. These contaminants included the pesticides dichlorodiphenyltrichloroethane (DDT), dichlorodiphenyldichloroethene (DDE), and dichlorodiphenyldichloroethane (DDD). The risk assessment assumed residential land use and exposure to adults and children by soil ingestion, soil contact, and inhalation of soil particles. The risk assessment results indicated, on the basis of a residential-use scenario, that there was no significant environmental or human-health threat from the pesticides (GeoRemediation 1992a). DTSC issued a letter on 27 May 1992 concurring with the finding that no further action for the parcel is necessary regarding pesticide-contaminated soil.

Additionally, groundwater sample results presented in the draft final RI Report for OU-1 and OU-2 (BNI 1997b) did not indicate the presence of pesticides in groundwater beneath Parcel 33. While selenium was detected in groundwater during the RI at concentrations exceeding the PEA screening levels, an analysis of background metals in groundwater performed during the RI indicated that detected concentrations of selenium in groundwater were not the result of base operations, but rather naturally occurring.

In 1996, soil samples were collected to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b). This study included some or all of Parcels 6, 8, 25, 26, and 30 through 32. The pesticides DDD, DDE, DDT, alpha-chlordane, dieldrin, endosulfan II, gamma-chlordane, and methoxychlor were reported in soil samples at concentrations above the respective detection limits. Pesticide concentrations were compared with those reported in soil collected from Parcels 38 and 39 during a previous pesticides investigation (GeoRemediation 1992b). The results of the comparison indicated that pesticide concentrations in soil are at levels below or within the statistical range calculated for Parcels 38 and 39. Parcels 38 and 39 were considered to be good examples of worst case scenarios for evaluating residual pesticides in soil; therefore, it was concluded that residual levels of pesticides in soil from the 1996 investigation do not constitute a threat to human health or the environment.

Additionally, 11 metals were detected at concentrations above background values and some pesticides (DDD, DDE, and DDT) were detected that were not found during the Parcels 38 and 39 investigation. Therefore, a screening risk

assessment using the highest measured concentrations and U.S. EPA residential soil preliminary remediation goals was conducted. The risk assessment used the conservative approximation that people would be present on the land 24 hours a day for 30 years. The screening risk assessment results for metals and pesticides indicated no significant risk to human health or the environment (BNI 1996b).

Although pesticides were reportedly applied to some or all of Parcels 6, 8, 25, 26, and 30 through 33, the PEA sampling and risk assessment and the pesticide investigation conducted in 1996 indicated that the property was suitable for unrestricted, residential use. DTSC provided concurrence on the findings in the PEA for the area containing Parcel 33 and the 27 May 1992 NFA concurrence letter is provided in Attachment 2. Based on the conclusions from the PEA report and the RI, Parcel 33 does not require any restrictions for pesticides. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.

8.2 Notification – Polychlorinated Biphenyls

An inventory of PCB items and equipment at MCAS Tustin was conducted in 1992 (Kennedy/Jenks Consultants 1992). One item (a small capacitor) at Building 525 (located on Parcels 5 and 40) was found to potentially contain PCBs (Table 6). Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor. However, small capacitors may contain PCB-impregnated solid insulation. If the transferee plans to dispose of equipment containing more than 50 parts per million (ppm), the PCB small capacitors in those motors should be processed as regulated items.

Fluorescent light fixtures were not included in the PCB items and equipment survey. Because some of the buildings on Parcels 4, 12, and 40 were built before 1979, it is assumed that some light ballasts in the buildings may contain PCBs. Fluorescent light ballasts manufactured before 1979 often contain PCB small capacitors that may be disposed as municipal solid waste. No action is required at the buildings unless large quantities of PCB-containing fluorescent light ballasts are removed. According to DON guidance on disposal of fluorescent light ballasts containing PCBs (DON 1989), large quantities of PCB small capacitors generated from fluorescent light ballasts, such as when the fixtures in a large office or an entire building are replaced, should be disposed as regulated PCB equipment.

Fluorescent light ballasts that contain PCBs have approximately 1.0 to 1.5 ounces of PCB fluid in each capacitor. For this given quantity, there would be approximately 3.1 to 4.7 pounds of PCB fluid for every 50 PCB small capacitors in fluorescent light ballasts. If the transferee plans to dispose fluorescent light ballasts or any other equipment containing more than 3 pounds of PCB fluids, the PCB small capacitors should be processed as regulated items.

In 1996, a PCB transformer survey was conducted at MCAS Tustin (PWC 1996). Per DON policy, transformers containing PCBs at concentrations exceeding 50 ppm were replaced. Transformers with PCB concentrations of less than 50 ppm are classified by federal standards as non-PCB transformers. The transformers that were tested for PCBs during this study and that are located within the boundaries of the transfer parcels contain PCBs at concentrations equal to or less than 2 ppm, and no additional action concerning transformers is required by DON before transfer.

8.3 Notification - Radon

DoD policy is to disclose all available and relevant radon assessment data pertaining to BRAC property being leased or transferred will be included in property lease/transfer documents. There is currently no federal requirement to perform follow-on radon assessment or mitigation in federal buildings, including those to be transferred to the public or private sector (DoD 1994b).

Though not required by regulatory agencies, DON conducted a radon survey at the housing areas of MCAS Tustin in 1991. Radon screening results were based upon a representative sampling of structures. The results indicated that none of the facilities or housing units contained levels of radon above 4 picocuries per liter (pCi/L). According to U.S. EPA guidance, radon at levels of 4 pCi/L or less are considered "low risk," and no mitigation is required (DON 1991). Additional radon testing or mitigation, therefore, was not required.

8.4 Notification - Flood Plains

Parcel 33 is located within a flood zone. This area is classified by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps as a 100-year flood plain (FEMA 1999).

8.5 Notification - Wetlands

Parcel 42 and parts of Parcels 11, 12, and 40 consist of drainage facilities designated as jurisdictional waters of the United States under Section 404 of the Clean Water Act. There are 0.88 acre in Parcel 42 and 0.13 acre in Parcel 11 that have been designated as jurisdictional wetlands. The United States Army Corps of Engineers exerts jurisdiction over "waters of the U.S.," which include territorial seas, tidal waters, and nontidal waters. The drainages support cattail and other common marsh plants. The water source appears to be urban and agricultural runoff from both on-site and off-site sources. Development by the transferee in wetland areas will require Section 404 permits (DON 1999a).

8.6 Notification - Historic Property

The eastern portions of Blimp Mooring Mats 2 and 3 are located within the boundaries of Parcel 25, and the eastern portion of Blimp Mooring Mat 5 is located within the boundaries of Parcels 30 and 31. In a letter dated 28 June 1996,

the State Historic Preservation Officer (SHPO) concurred with the United States Marine Corp's determination that these mooring mats are eligible to be listed on the National Register of Historic Places. A Section 106 Consultation has taken place at MCAS Tustin, and it resulted in a Memorandum of Agreement (MOA) among DON, the SHPO, and the Advisory Council on Historic Preservation for the Disposal and Reuse of MCAS Tustin. The MOA was issued on 16 December 1999 (DON 1999b). It outlines measures to reduce, avoid, or mitigate adverse effects to historic properties. The MOA states that the mooring mats located in the transfer parcels do not have to be preserved after transfer (DON 1999b).

8.7 Notification - Prime/Unique Farmland

Prime farmland is located on Parcels 6, 8, 25, 26, and 30 through 32. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required (DON 1999a).

8.8 Notifications and Restrictions - Asbestos-Containing Material

DoD policy with regard to asbestos-containing material is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable Federal, State, and local laws and regulations governing ACM hazards. Therefore, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed as is through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building, and it is friable, accessible and damaged (FAD).

Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be incorporated into the EBS report or other appropriate document to be provided to the transferee. The survey report or document shall include:

- Reasonably available information on the type, location, and condition of asbestos in any building or improvement on the property;
- Any results of testing for asbestos;
- A description of any asbestos control measures taken for the property;
- Any available information on costs or time necessary to remove all or any portion of the remaining ACM; however, special studies or tests to obtain this material are not required; and
- Results of a site-specific FAD ACM survey performed to revalidate the condition of the ACM.

However, the DON is required to conduct a FAD ACM survey only when the reuse plan calls for a building to be reused/occupied, rather than demolished. Furthermore, a FAD ACM survey is not required if ACM has never been

identified in the interior of a building during any previous asbestos survey, or if an asbestos survey conducted after 1996 found no damaged ACM and there is no reason to suspect any damaged ACM is present. The 1996 date was established to be consistent with the Asbestos Hazard Emergency Response Act (AHERA), which calls for a re-inspection to assess the physical condition (i.e., good or damaged) of ACM at least once every three years. Since base closure occurred in 1999, any qualified inspection performed in 1997 or later meets the intent of these regulations.

Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property (i.e., FAD ACM). This remediation should be accomplished by the DON or by the transferee under a negotiated requirement of the property transfer. Use of such buildings must be restricted until abatement has been completed.

The remediation discussed above will not be required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to the demolition; and the transferee assumes responsibility for the management of any ACM in accordance with applicable laws. Buildings which are to be demolished may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.

A graphical representation of this policy and the decision-making process is presented as Figure 11.

The following summarizes notifications and restrictions due to ACM present in buildings located within the transfer parcels.

8.8.1 NOTIFICATIONS

ACM has been identified in buildings and structures located on Parcels 4, 12, 37, and 40. Three ACM surveys conducted at MCAS Tustin included buildings in the transfer parcels, and the survey results were presented in reports dated December 1991, January 1995 and January 2001 (Ecology and Environment, Inc. 1991; PWC 1995a,b,c,d,e; URS 2001, respectively). The January 2001 survey was limited to FAD ACM. Results from the ACM surveys are summarized in Table 7. To assure full disclosure of all ACM on the FOST parcels, copies of the ACM survey reports will be included in the transfer documentation.

8.8.1.1 Buildings Planned for Demolition or "To Be Determined (TBD)"

Building 176 was built in 1967 and is located in Parcel 4. The 1991 asbestos survey reported numerous types of friable and non-friable ACM. See Table 7 for a description.

Buildings 180 and 181 were built in 1967 and are located in Parcel 40. The 1991 asbestos survey reported only exterior non-friable ACM (roofing).

Building 182 was built in 1967 and is located in Parcel 40. The 1991 asbestos survey reported only exterior non-friable ACM (roofing).

Building 220 was built in 1977 and is located in Parcel 12. The 1991 asbestos survey reported only exterior non-friable ACM (roofing). The January 2001 survey reported no FAD ACM in the building.

Building 244 was built in 1981 and is located in Parcel 40. The 1991 asbestos survey reported only exterior non-friable ACM (roofing).

Building 255 was built in 1984 and is located in Parcel 8. This building has never been surveyed.

Building 508 was built in 1985 and is located in Parcel 10. This building has never been surveyed.

Building 525 was built in 1988 and is located in Parcels 5 and 40. This building has never been surveyed.

Buildings 527, 531 and 532 were built in 1988 and are located in Parcel 4. These buildings have never been surveyed.

Building 536 was built in 1988 and is located in Parcel 5. This building has never been surveyed.

Building 537 was built in 1987 and is located in Parcels 10, 12 and 40. This building has never been surveyed.

Buildings 544 and 545 were built in 1989 and are located in Parcel 12. These buildings have never been surveyed.

Building 551 was built in 1984 and is located in Parcel 40. This building has never been surveyed.

Building 568 was built in 1990 and is located in Parcels 11, 12 and 40. This building has never been surveyed.

Marble Mountain Park Housing is comprised of three communities which were built between 1984 and 1990, and is located in Parcel 37. The 1995 asbestos surveys reported only non-friable ACM (floor tile and mastic) in Marble Mountain Park 3. No ACM was identified in Marble Mountain Park 1 and 2.

8.8.1.2 Buildings Planned for Reuse

Building 273 was built in 1987 and is located in Parcel 12. This building had never been inspected for asbestos during the operational life of the base. Since this building was specified as being reused, the DON conducted a FAD ACM survey pursuant to DoD policy. The limited survey to identify FAD ACM was conducted in Building 273 in January 2001 (URS 2001). No FAD ACM was identified in the building.

Building 520 was built in 1987 and is located in Parcel 10. This building had never been inspected for asbestos during the operational life of the base. Since this building was specified as being reused, the DON conducted a FAD ACM survey pursuant to DoD policy. The limited survey to identify FAD ACM was conducted in Building 520 in January 2001 (URS 2001). No FAD ACM was identified in the building.

Buildings 528, 529 and 530 were built in 1988 and are located in Parcel 7. These buildings had never been inspected for asbestos during the operational life of the base. Since these buildings were specified as being reused, the DON conducted a FAD ACM survey pursuant to DoD policy. The limited survey to identify FAD ACM was conducted in Buildings 528, 529, and 530 in January 2001 (URS 2001). No FAD ACM was identified in any of the buildings.

Building 546 was built in 1989 and is located in Parcel 12. This building had never been inspected for asbestos during the operational life of the base. Since this building was specified as being reused, the DON conducted a FAD ACM survey pursuant to DoD policy. The limited survey to identify FAD ACM was conducted in Building 546 in January 2001 (URS 2001). No FAD ACM was identified in the building.

8.8.2 RESTRICTIONS

Building 176 and Marble Mountain Park Housing Community – Since the ACM surveys for Building 176 and Marble Mountain Park Housing Community were conducted prior to 1997, the physical condition of the interior ACM as stated in the existing reports may no longer be accurate. Nevertheless, since building 176 is slated for demolition and the disposition of the housing units has not been determined, the DON is not obligated to conduct any additional surveys. In accordance with policy, these buildings will be restricted from occupancy, and the deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws. These buildings may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.

Buildings 255, 508, 525, 527, 531, 532, 536, 537, 544, 545, 551 and 568 – Since no ACM surveys have ever been conducted on these buildings, they will be restricted from occupancy prior to demolition, and the deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws. Since the buildings are slated for demolition, the DON is not obligated to conduct an asbestos survey. These buildings may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.

Buildings 180, 181, 182 and 244 – Since no interior ACM was observed in these four buildings and they are scheduled for demolition, these buildings may be transferred without restrictions for occupancy due to ACM. However, the

transferee must still assume responsibility for the management of the existing ACM, if any.

Buildings 220, 273, 520, 528, 529, 530 and 546 – Since no FAD ACM was found in these buildings, they may be transferred without restrictions for occupancy due to ACM. However, the transferee must still assume responsibility for the management of ACM, if any.

8.9 Notifications and Restrictions – Lead-Based Paint

The following text provides information on LBP evaluations for these parcels including the requirements for surveys, notification of survey results, and restrictions based on identified LBP hazards prior to transfer of property.

Residential Buildings

DoD policy for residential buildings is contained in the joint U.S. EPA/DoD interim final Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property (DoD 1999). The requirements in this document are principally from Title X, the Residential Lead-Based Paint Hazard Reduction Act, which includes the implementing regulations under Toxic Substances Control Act (TSCA) Section 403 and Housing and Urban Development (HUD) Section 1012/1013. Title X applies to "target housing" which is housing constructed before 1978, except for homes designated for elderly or disabled persons and/or dwellings in which living areas are not separated from the sleeping area (e.g., barracks). Title X requires that federally-owned residential real property scheduled for transfer conduct:

- Inspection, risk assessment, and abatement of lead-based paint hazards (lead-based paint, soil, and dust) in target housing constructed prior to 1960.
- Inspections and risk assessments for target housing constructed between 1960 and 1978.

DoD policy includes additional requirements that go beyond the Title X statutory requirements related to LBP including:

- Soil lead hazards surrounding target housing constructed between 1960 and 1978 will be abated by DON or will be abated by the transferee as part of the transfer agreement.
- For child-occupied facilities (i.e., day care centers, preschools) located on residential real property that will be reused as child occupied facilities after transfer, DON will evaluate for lead-based paint hazards.
- The soil adjacent to target housing scheduled for demolition and planned for redevelopment after transfer will be evaluated for soil-lead hazards by the transferee after demolition of the existing target housing units. The transferee will conduct abatement of soil-lead hazards identified in the evaluation prior to occupancy on the new housing units.

Prior to transferring the property, the DON is required to document surveys result by disclosing any known LBP and/or LBP hazards in the Basewide EBS and referencing the evaluation results in the FOST and transfer documents for the residential buildings. If hazards exist at the time of transfer, the transfer document will prohibit occupancy of housing units until the buildings are demolished.

Buildings that are scheduled for demolition may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement in accordance with all local, state, and federal requirements. In the event the transferee conducts LBP abatement activities prior to demolition, the transferee shall, prior to occupation of the buildings, conduct soil sampling in the areas where the housing units are located to verify the soil has not been adversely affected by the release of LBP.

Nonresidential Buildings/Structures

In order to address the risk of adverse health effects to children from LBP exposure, legislation and national policy regarding LBP has focused on residential areas and child-occupied facilities where children under the age of 6 may be present. Non-residential buildings (e.g., warehouses and office buildings) are typically occupied by adults with minimal exposure to children. DON will not conduct sampling at non-residential buildings prior to transfer. Any evaluation and abatement of LBP at non-residential buildings will be the responsibility of the transferee.

Non-residential buildings scheduled for demolition will require post-demolition soil sampling and abatement of any soil-lead hazards by the transferee prior to occupation of any new buildings. Buildings which are scheduled for demolition may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement in accordance with all local, state, and federal requirements.

Information pertaining to LBP at non-residential buildings, if any, will be provided to the transferee with the transfer documents. Notification of potential LBP at non-residential buildings where surveys were not conducted will be based solely on the age of construction (i.e., constructed before 1978).

8.9.1 NOTIFICATIONS

The only residential units on the transfer parcel are the Marble Mountain Park housing area. Since this housing area was constructed after 1978, lead-based surveys are not required. However, surveys were conducted in 1994 as part of a basewide housing study. The survey consisted of lead-in-soil and lead-in-dust sampling at a representative number of housing units. Lead-in soil results were well below 100 parts per million and lead-in-dust results were below HUD guidelines. A copy of the lead survey will be included in the transfer documentation.

There are a total of 56 non-residential buildings and structures located within the southern parcels transfer area. Of these building and structures, the following were constructed before 1978 when LBP was commonly used throughout the United States, including military installations:

- Building 176 (Parcel 4) was previously used as an administration building. The building contained visual signs of slight peeling of paint. This building is scheduled for demolition after transfer and the area will be redeveloped for commercial business.
- Structure 237 (Parcel 4) is a concrete pad for an existing transformer. Limited potential for LBP to be released to the soil since only portions of the transformer casing were painted. This structure is scheduled for demolition after transfer and the area will be redeveloped for commercial business.
- Structure 611 (Parcel 7) was previously used as a hazardous waste storage pad that was investigated under AOC ST-2 (closed with NFA concurrence). The structure consists of an asphalted area with a berm and surrounded by a chain-linked fence. No painted surfaces were identified.
- Structure 205 (Parcel 12) is a sewage pump station, which is contained within a concrete vault. Controls for the pump were situated immediately adjacent to the station. Steel cover over the vault was painted; however, the cover looked relatively new. This structure is scheduled for demolition after transfer and the area will be redeveloped for commercial business.
- Structure 231 (Parcels 12 and 40) was previously used as an engine test cell pad. This structure consists of a concrete pad with drains. No painted surfaces were identified.
- Structure 604 (Parcel 25) was previously a transmitter station and consisted of a concrete pad with steel bollards. Approximate area for the station was 5 feet by 5 feet. No painted surfaces were identified.
- Structure 605 (Parcel 25) was previously a receiver station and consisted of an asphalted pad with steel bollards. Approximate area for the station was 5 feet by 5 feet. No painted surfaces were identified.
- Building 180 (Parcel 40) was previously used as a line maintenance shack. Peeling paint was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway.
- Building 181 (Parcel 40) was previously used as a line maintenance shack. Peeling paint was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway.

- Building 182 (Parcel 40) was previously used as a line maintenance shack. Peeling paint and fire damage was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway.
- Structure 229 (Parcel 15 and 40) was previously used as an aircraft washrack pad. The area is asphalted and includes a drain. No painted surfaces were identified.

The ages of construction for these buildings and structures suggest the likelihood that LBP may be present. Therefore, there is a possibility that, through the normal weathering, lead from LBP is in the soil surrounding these structures.

8.9.2 RESTRICTIONS

Residential Buildings

There are no restrictions based on LBP at the Marble Mountain housing area located within Parcel 37.

Nonresidential Buildings/Structures

Buildings 176, 180, 181, 182, and Structure 237: Since these buildings were constructed prior to 1978 (when LBP was potentially used) and are scheduled for demolition, the buildings will be restricted from use prior to demolition and the transferee will conduct post-demolition sampling of the soil and conduct any required abatement prior to occupancy of newly constructed buildings.

Structures 205, 229, 231, 604, 605 and 611: Since these areas did not have painted surfaces (or limited amounts) and the types of activities do not suggest previous use, no restrictions are required prior to and after demolition of these structures.

All Remaining Buildings and Structures (Table 1): Since these buildings were constructed after 1978, no restrictions or requirements are necessary for LBP.

8.10 Notification - School Site Considerations

Parcel 31 has been proposed in the Reuse Plan for a school site after transfer of the property. Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code (CEC) section 17210 et. seq. will need to be conducted and approved by the Department of Toxic Substances Control (School Property Evaluation and Cleanup Division). The CEC requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium),

gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA.

Any requirements associated with the evaluation of the proposed school site for compliance with the CEC are the responsibility of the transferee, and not DON.

8.11 Covenant - Additional Remedial Action

The deed for transfer will include a covenant of the United States, made pursuant to CERCLA Section 120(h)(3)(A)(ii)(II), warranting that any additional remedial action found to be necessary after the date of transfer as a result of former activities conducted by the United States within these parcels shall be performed by the United States. This covenant will not apply to any remedial action required on the property that is a result of an act or omission of the transferee that causes a new release of hazardous substances.

8.12 Right of Access

The deed shall reserve and the transferee shall grant to the United States an appropriate right of access to the FOST parcels, pursuant to CERCLA Section 120(h)(3)(A)(iii), to enable the United States and others to enter said parcels in any case in which remedial action or corrective action is found to be necessary on said parcels or adjacent property after the date of property transfer.

Access to background groundwater monitoring wells BMW10D, BMW10R, and BMW10S (Parcel 8); BMW13S (Parcel 11); BMW02S and BMW02D (Parcel 26); and A000SB50D2, A000SB51R, ASB40S, and ASB41D (Parcel 40) and surface water gauging locations 5SW06 (Parcel 40) and BSW09 (Parcel 41), used for quarterly water-level measurements, will also be required after property transfer (Figure 9). A summary of the monitoring activities is included in Table 8.

9.0 FINDING OF SUITABILITY

Pursuant to CERCLA Section 120(h)(3)(A)(i) and the provisions of 40 *Code of Federal Regulations* Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the applicable transfer parcels at MCAS Tustin. A release or disposal of hazardous substances or petroleum products has occurred within the transfer boundaries of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, and portions of 40 included in this FOST. The Hazardous Substance Notification Table and UST/AST Substance Notification Table are provided in Attachment 3. The UST/AST Substance Notification Table lists the UST/AST sites (containing petroleum products) which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14).

On the basis of the foregoing information and analysis, I have concluded that the requirements of CERCLA Section 120(h)(3) have been met, and I find that Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, portions of 40 and 41, and 42, with the exception of the identified CO areas, are suitable for transfer by deed for unrestricted residential use, subject to the notifications and restrictions set forth in Section 8.0. The parcels can be used with acceptable risk to human health and the environment and without interference with the environmental restoration process.

Date 28 SEPT 01

G. A. ENGLE
Captain, CEC, U.S. Navy
Commander

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MCAS TUSTIN
SSIC # 5090.3

TABLES

FINDING OF SUITABILITY TO TRANSFER FOR SOUTHERN PARCELS 4-8, 10-12, 14, AND 42 AND PARCELS 25, 26, 30-33, 37 AND PORTIONS OF 40 AND 41

DATED 28 SEPTEMBER 2001

Table 1
Buildings/Structures Summary
Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Building (B)/ Structure (S) No.	Parcel	Prior Use	Year Built	Total Area (sq. ft.)	Condition*	Proposed Disposition	Ultimate Parcel Use
B 176	4	Administration building	1967	9,760	Fair	Demolition	Commercial/Business
S 237	4	Transformer pad	1967	NA	Fair	Demolition	Commercial/Business
B 527	4	Flight line shelter	1987	2,000	Poor	Demolition	Commercial/Business
B 531	4	Weather annex	1988	800	Fair	Demolition	Commercial/Business
B 532	4	Generator building	1988	192	Fair	Demolition	Commercial/Business
S 571	4	Hazardous waste storage pad	1991	80	Poor	Demolition	Commercial/Business
S 572	4	Hazardous waste storage pad	1991	NA	Poor	Demolition	Commercial/Business
S 601	4	Hazardous/flammable material locker pad	1992	100	Poor	Demolition	Commercial/Business
B 525	5, 40	Hangar	1987	45,959	Good	Demolition	Commercial/Business
S 535	5	Aircraft washrack	1988	NA	Poor	Demolition	Commercial/Business
B 536	5	Washrack utility building	1988	672	Fair	Demolition	Commercial/Business
B 528	7	Administration building	1988	4,935	Good	Reuse	Commercial/Business
B 529	7	Supply building	1988	15,000	Good	Reuse	Commercial/Business
B 530	7	Communications/maintenance building	1988	5,029	Good	Reuse	Commercial/Business
S 566	7	Lube rack ramp	1988	1,760	Good	Demolition	Commercial/Business
S 610	7	Generator washrack	1988	NA	Poor	Demolition	Commercial/Business
S 611	7	Hazardous material storage pad	1970	NA	Poor	Demolition	Commercial/Business
B 255	8	Refueler administration building	1984	700	Poor	Demolition	Commercial/Business
B 508	10	Aircraft washrack building	1985	684	Poor	Demolition	Commercial/Business
S 517	10	Aircraft washrack	1985	NA	Poor	Demolition	Commercial/Business
B 520	10	Hangar	1989	63,289	Good	Reuse	Commercial/Business
B 537	10, 12, 40	Engine maintenance shop	1988	35,717	Good	Demolition	Commercial/Business
S 581	10	Hazardous waste storage pad	1990	NA	Poor	Demolition	Commercial/Business
S 599	10	Hazardous/flammable material locker pad	1992	100	Poor	Demolition	Commercial/Business
B 568	11, 12, 40	IMA complex	1991	19,680	Good	Demolition	Commercial/Business
S 595	11	Sewage lift station	1991	NA	Fair	Demolition	Commercial/Business
S 205	12	Sewage pump station	1967	NA	Fair	Demolition	Commercial/Business
B 220	12	Engine test cell administration	1981	675	Good	TBD	Commercial/Business
S 231	12, 40	Engine test cell pad	1968	4,022	Good	Reuse	Commercial/Business
B 273	12	Engine test cell	1987	2,974	Good	Reuse	Commercial/Business
B 544	12	Restroom facility	1989	2,005	Good	Demolition	Commercial/Business
B 545	12	Sentry booth	1989	91	Poor	Demolition	Commercial/Business
B 546	12	Electrical/storage room	1989	1,755	Good	Reuse	Commercial/Business
S 559	12	Loading ramp	1990	NA	Fair	Demolition	Commercial/Business
S 565	12	Tactical supply van pads complex	1989	NA	Good	Demolition	Commercial/Business
S 586	12	Hazardous waste storage pad	1991	NA	Poor	Demolition	Commercial/Business
S 591	12	Hazardous waste storage pad	1991	NA	Poor	Demolition	Commercial/Business
S 543	14	Rinse facility	1988	NA	Poor	Demolition	Commercial/Business

Table 1 (continued)
Buildings/Structures Summary
Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Building (B)/ Structure (S) No.	Parcel	Prior Use	Year Built	Total Area (sq. ft.)	Condition*	Proposed Disposition	Ultimate Parcel Use
S 604	25	Transmitter	1971	NA	Poor	Demolition	Commercial/Business
S 605	25	Receiver	1971	NA	Poor	Demolition	Commercial/Business
NA	37	Marble Mountain Park Housing Community	1984, 1989	NA	NA	TBD	Residential
S 6857	37	Sewer lift station	NA	NA	Fair	Demolition	Residential
B 180	40	Line maintenance shack	1967	1,050	Poor	Demolition	Circulation facilities
B 181	40	Line maintenance shack	1967	1,400	Poor	Demolition	Circulation facilities
B 182	40	Line maintenance shack	1967	1,050	Poor	Demolition	Circulation facilities
S 229	40	Aircraft washrack pad	1960	755	Poor	Demolition	Circulation facilities
B 244	40	Flight line shack	1981	1,000	Poor	Demolition	Circulation facilities
B 551	40	Washrack building	1989	1,000	Poor	Demolition	Circulation facilities
S 583	40	Hazardous waste storage pad	1991	200	Poor	Demolition	Circulation facilities
S 598	40	Hazardous/flammable material locker pad	1992	200	Poor	Demolition	Circulation facilities
S 606	40	Reflector	1991	120	Poor	Demolition	Circulation facilities

Notes:

* condition of building as specified in the Reuse Plan (City of Tustin 1998)

Acronyms/Abbreviations:

IMA – intermediate maintenance activity
NA – not available
No. – number
sq. ft. – square feet
TBD – to be determined

Table 2
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
AST-03A	4	Two vertical tanks (A and B), located in Quonset hut area at Warner and Red Hill Avenues, were identified in an aerial photo dated 20 September 1965. These tanks are not identifiable in photos taken after 1972. The Quonset area has since been redeveloped, and the AOC is covered with dry grass. No evidence of vertical tanks was identified during the VSI.	RCRA AOC RFA conducted Final RFA Report (04/97): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 07/24/97)	3
ST-03	4	Closed. This unit (east of Bldg. 527) was a paint locker operated by Heavy Medium Helicopter (HMH-465) to store hazardous waste and materials used in the maintenance of helicopters until 1995. The 9- by 12- foot locker was constructed of steel, set on a plastic liner, and contained 10 to 20 10-gallon cans. There was no containment around the locker except a sandbag berm. At the time of the VSI, HMH-465 had decommissioned and removed the temporary storage unit from this area.	RCRA AOC Closure under RAC; No RA required Technical Closure Memo (03/04/97) NFA concurrence	 Complete Complete Complete (Letter 07/24/97)	3
ST-4A	4	Closed. This unit (Bldg. 571) (ST-4A) was operated by HMH-466 for temporary storage (less than 90 days) of drums containing hazardous waste. This unit was installed in 1991 and ceased operation in 1995. Drums were stored on a 16- by 16-foot fenced concrete pad with a sump within a 6-inch containment berm. The entire storage and containment system appeared to have good integrity. Waste stored at this unit consisted of paints, solvents, oily rags, and used oil.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	3
ST-4B	4	The RAC contractor investigated a dirt/grass area located northeast of area 4A (ST-4B) as part of closure activities for ST-4A.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	3
ST-5A	4	Inactive. This unit (Bldg. 572) was operated by HMH-465 for temporary storage (less than 90 days) of drums containing hazardous waste. The unit was installed in 1991 and ceased operation in 1999. Drums were stored on a 18- by 23-foot fenced concrete pad with a sump within a 6-inch containment berm. The entire storage and containment system appeared to have good integrity. This storage area replaced a former temporary area near Bldg. 525 just to the south (ST-5B). Waste stored at this unit consisted of solvents, oily rags, waste JP-5, and oil.	RCRA AOC Closure by RAC No RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 05/18/00)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
ST-5B	4	Closed. This unit (south of Bldg. 572) was operated by HMH-465 for temporary storage of drums containing hazardous waste. This unit was demolished in 1991 and was replaced by Bldg. 572 (ST-5A). The former temporary area was located between Bldg. 572 to the north and a temporary hazardous material storage locker to the south. The former facility was constructed on a plastic liner with a sandbag berm. Although the hazardous storage locker could not be visually inspected, it appears to be similar in construction to ST-03. Waste stored at this unit consisted of solvents, oily rags, waste JP-5, and oil. Operation at the unit was terminated in 1991.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	1
ST-78	4	Closed. This unit (Bldg. 601) (ST-78A) was built in 1992 for temporary storage of hazardous materials. The unit operated from 1992 to 1995. The unit was constructed of a concrete pad with a sump within a 6-inch berm. A paint locker (ST-78B) was also present to the northeast of the concrete pad. It was constructed of steel and its dimensions were 9- by 12-feet.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	3
AST-02	5	A site, 1,380 feet east of Red Hill Avenue and 325 feet south of Warner Avenue, was identified in an aerial photo from 29 December 1947. An object less than 30 feet long, possibly a POL/chemical tank, was identified at the site. A dark spot, possibly a burn pit, is visible in most of the aerial photos taken prior to 26 July 1988, when construction of Aircraft Parking Apron No. 4 was underway. This site is under the Tarmac. Monitoring wells downgradient of the site will be monitored.	CERCLA AOC RFA conducted SV (groundwater only) No RA required Final RFA Report (04/97): groundwater to Basewide Study Final RI Report (11/97): NFA recommended OU-2 (NFA) RAP/Proposed Plan NFA ROD	 Complete Complete Complete Complete Complete Complete ROD signed 09/28/00	3
MWA-02	5	Inactive. The unit was a wash pad (Bldg. 535) operated by MALS-16 for cleaning helicopters and equipment. The wash area consisted of an 80- by 80-foot concrete pad sloped to a drain and contained within a 6-inch concrete berm. The unit was constructed in August 1988. Oily water flowed through the drain into O/W SEP-536 (TOW-02), which discharged wastewater to the sanitary sewer system. The waste oil was pumped out periodically for off-site disposal/recycling. The integrity of the concrete pad appeared to be good. Dates of operation were 1988 to 1999.	RCRA AOC Closure by RAC under RCRA No RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 05/18/00)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
ST-6	5	Inactive. This unit (dirt area east of Bldg. 536) consisted of three paint lockers operated by HMH-466 to store hazardous materials used in the maintenance of helicopters. The lockers were constructed of steel and contained 20 to 30 10-gallon cans. The larger locker was 7- by 12-feet and the two smaller lockers were each 2- by 3-feet. No containment was provided around the lockers. The integrity of the storage area and containers was fair to good. Hazardous materials stored at this unit included paints, solvents, hydraulic fluids, and lubricants. Dates of operation were 1991 to 1996.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	1
ST-91	5, 40	Inactive. This unit (Bldg. 525) was operated by MAG-16 Helicopter Squadron. It was constructed in 1988 and was taken out of service in 1998. The unit was specially designed to store, repair, and maintain helicopters. Three sumps (1- by 2-feet) evenly spaced, ran along the interior of the unit to contain releases. The unit was approximately 115 by 186 feet. The integrity of the unit was good.	RCRA AOC Closure by RAC under RCRA Closure Report (12/00): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	4
TOW-02	5	Removed. O/W SEP-536 was a 500-gallon steel unit located north of Bldg. 536 and was used by MALS-16. The tank was used for separating oil and wastewater generated from adjacent wash area MWA-02 (Bldg. 535). The O/W SEP was connected to a 150-gallon UST (UST-536) for storage of waste oil prior to off-site disposal. The separator was equipped with an alarm to warn of system overflow into the sanitary sewer. Oily water with detergents was generated from washing the helicopters in adjacent MWA-02.	RCRA AOC Closure by RAC under RCRA: RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 05/18/00)	1
AD-07	6	A possible trench, 530 feet long, extending out in a north-northwesterly direction from the future location of the Marine Air Traffic Control Squadron (MATCS) compound in Parcel 6, was identified in an aerial photograph dated 20 September 1965. Two small "dark spots" were identified at the northwest end of the possible trench. The aerial photographic analysis suggests that these spots were possible small holes used for dumping. The linear feature, a trench or road, and a feature at the northwest end of the trench or road were visible in subsequent aerial photographs through 1972. The site is currently an agricultural field, and no indications of structures were visible at this location during the supplemental VSI conducted in December 1995. Discussion with the station engineer during the VSI suggested that the feature was related to the early MATCS operations that predate the current structures in the MATCS compound. Based on dates of service and alignment with the main runway, the dark spots were likely a navigational aid known as a "TACAN" with a roadway connecting the TACAN to the MATCS buildings. MATCS construction was completed in 1972, after which time the site in the agricultural field is no longer visible in aerial photographs.	RCRA AOC VSI conducted December 1995 NFA concurrence	 Complete Complete (Letter 04/09/97)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
AST-03B	6	Two vertical tanks (A and B), located in Quonset hut area at Warner and Red Hill Avenues, were identified in an aerial photo dated 20 September 1965. These tanks are not identifiable in photos taken after 1972. The Quonset area has since been redeveloped, and the AOC is covered with dry grass. No evidence of vertical tanks was identified during the VSI.	RCRA AOC RFA conducted Final RFA Report (04/97): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 10/22/96)	3
MGR-01	7	Inactive. This unit was a 110- by 16-foot concrete ramp located near Bldg. 530 in the MATCS compound on Barranca Parkway. The ramp was designated as Bldg. 566. Although intended to be used as a grease rack, this unit was never used as such. The rack was installed in 1988 and included a drain/sump that directed any flow from the rack to a waste oil tank (UST-530B), which also received oil from O/W SEP (TOW-01) connected to Wash Area MWA-01. During the supplemental VSI conducted in December 1995, no hazardous waste was stored or handled at the unit, and there were no visible or reported release identified. No source of contamination is currently associated with this site. The supplemental VSI recommended no further action at this site on the basis that the site was never used as a grease rack. Dates of operation were 1988 to 1999.	RCRA AOC VSI conducted in December 1995 Closure by RAC under RCRA Closure Report (12/00): NFA recommended NFA concurrence	 Complete Complete Complete Complete (Letter 02/22/01)	1
MWA-01	7	Inactive. The unit was a wash pad (Bldg. 610) associated with Bldg. 530, operated by MATCS to clean vehicles and generators. The unit was constructed in September 1988. The wash area consisted of a 50- by 16-foot concrete pad sloped to two drains. Oily water flowed through the drains into an adjacent 350-gallon O/W SEP-530 (TOW-01), which discharged wastewater to the sanitary sewer system. The waste oil flowed to a 1,000-gallon UST (UST-530B) for storage of waste oil prior to off-site disposal/recycling. The integrity of the concrete pad appeared to be good. A temporary storage area (ST-2) was located at the southeast end of the pad. Dates of operation were 1988 to 1999. A sampling visit was recommended for this site because the area was not protected by containment berms. According to Navy personnel, the washpad was subsequently bermed (03/27/95).	RCRA AOC RFA conducted Closure by RAC under RCRA Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete Complete (Letter 12/09/99)	1
ST-2	7	Decommissioned. The unit (Bldg. 611) was a temporary storage area operated by MATCS-38 to store drummed hazardous materials used in the maintenance of generators and vehicles. At the time of the VSI, the 16- by 16-foot area was fenced and bermed with a plastic liner and sandbags for containment. Hazardous materials stored at the unit consisted of hydraulic fluids, ethylene glycol, antifreeze, grease, oil, degreaser, and cleaning solvents. Dates of operation were 1970 to 1997.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
TOW-01	7	Removed. O/W SEP-530 was a 350-gallon steel unit located near Bldg. 556 (Lube Rack) (MGR-01) and was operated by MATSC. Used for separating oil and wastewater from the adjacent wash area MWA-01 (Bldg. 610), which was used for cleaning equipment, generators, and vehicles. The O/W SEP was connected to a 1,000-gallon UST (UST-530B) for storage of waste oil prior to off-site disposal. According to the VSI, the overall integrity of the unit appeared good. No monitoring system was in place at this unit; however, secondary containment was present. Cleaning operations generated oily water, possibly containing solvents and detergents.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 11/16/00)	4
MAW-06	8	Well #1 is an active agricultural well located on MCAS Tustin property.	Active well Removed from consideration by BCT	 Complete (Letter 07/12/01)	1
MFL-1B	8	Inactive. The JP-5 fuel distribution system consists of a 4-inch-diameter main line that runs from the tank farm at the two fueling mats and a series of 8-, 5-, and 4-inch-diameter lines running from the tanks to the dispensing stations. The main line was approximately 7,200 feet in length, and there were 275 feet of 8-inch line, 450 feet of 5-inch line, and 750 feet of 4-inch line. There was also a series of 3- and 2-inch-diameter return lines. There were approximately 275 feet of 3-inch line and 1,050 feet of 2-inch line. Dates of operation were 1964 to 1997.	Closure under RAC; 4-inch pipeline grouted in place Closure Report JP-5 Pipeline (01/12/99) NFA concurrence	Complete Complete Complete (Letter 12/21/99)	2
MMS-02 (G-L)	8	As reported in the revised PR/draft VSI Report, there have been 18 reported small-quantity spills at the two aircraft fueling aprons (parking Apron No. 1 and No. 2) since 1988. The spills occurred during the fueling of aircraft and were mostly contained on the asphalt/concrete apron. The report recommended no sampling as the site was incorporated into the boundaries of (former) IR-7 (north and south).	RCRA AOC No SV conducted NFA concurrence	 Complete (Letter 09/16/96)	1
ST-68 (D-F)	8	A temporary storage unit (ST-68) was identified as part of IR-7 north (aircraft parking apron No. 1) and at IR-7 south (ST-68A) in the revised PR/draft VSI report. This report documented no evidence of a release, nor were hazardous wastes stored at the site.	RCRA AOC NFA concurrence	 Complete (Letter09/16/96)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
AD-04	10	A possible small trench extending 105 feet north from the east end of the garage structure at the Armed Services Reserve Center garage on Barranca Road was identified in an aerial photo dated 20 September 1965. A dark spot was identified in the vicinity of this possible trench (see AMS-08) in an aerial photo dated 30 May 1966. The area of concern is currently covered by vegetation. No visible evidence of a trench or stains was identified during the VSI.	CERCLA AOC RFA conducted Final RFA report (04/97): NFA recommended for soil; groundwater to Basewide Study Final RI report (11/97): NFA recommended OU-2 (NFA) RAP NFA ROD	 Complete Complete Complete Complete ROD signed 09/28/00	3
AD-06	10	A 230- by 230-foot trench enclosed by a low earthen berm was identified about 410 feet east of the east end of the Armed Services Reserve Center garage in an aerial photograph dated 30 May 1966. This area was not identifiable on available aerial photographs from successive years. This area is currently surrounded by fencing. This area was listed prior to receiving information from the Army on the use of this area. Subsequent interviews with Army personnel indicate this area was used to train Army reservists in the use of heavy earth-moving equipment.	CERCLA AOC No SV conducted NFA concurrence	 Complete (Letter 03/20/96)	1
MAE-01	10	Inactive. The sandblaster at Bldg. 537 was operated by MALS-16 and was used approximately 16 to 24 hours every week. It was in operation since 1988. The room housing the unit was equipped with a ventilating system consisting of a 20-hp blower connected to a baghouse that separated the silica sand, metal (aluminum oxide), and paint debris generated. The unit was periodically checked and certified by an industrial hygienist. The sandblasting unit and the baghouse were permitted by SCAQMD under Permit No. D21060. Dates of operation were 1988 to 1999.	RCRA AOC Closure by RAC Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	1
MWA-05	10	Inactive. The unit was a wash pad (Bldg. 517) adjacent to Bldg. 508 operated by MALS-16 and was used to contain oily water generated during washing of helicopters. The wash area consisted of an 86- by 86-foot concrete pad sloped to two drains and surrounded by a 6-inch concrete berm. Oily water flowed through the drains into O/W SEP-508 (TOW-06), which discharged wastewater to the sanitary sewer system. The integrity of the concrete pad appeared to be good.	RCRA AOC RFA conducted Closure by RAC under RCRA Closure Report: NFA Recommended NFA concurrence	 Complete Complete Complete Complete (Letter 03/09/00)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
MWA-21	10	Inactive. The unit (within Bldg. 520) was a wash rack used for cleaning aircraft and automobile parts. The unit was installed in 1989 and was connected to O/W SEP-520 (TOW-19). The overall integrity of the unit appeared to be good. Dates of operation were 1989 to 1999.	RCRA AOC RFA conducted Closure by RAC under RCRA Closure Report: NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 05/18/00)	1
ST-25	10	Closed. This unit (south of Bldg. 520) was operated by HMT-302 for temporary storage of drums containing hazardous materials. The unit was constructed in 1989 for storage of hazardous materials used in Bldg. 520. It consisted of a bermed facility with a plastic liner and sandbag berm for containment. According to the VSI, the overall integrity of the system was good. Hazardous materials stored at this unit included grease, aircraft soap, rags, speed dry, and JP-5. Dates of operation were 1989 to 1991.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	3
ST-26A	10	Inactive. This unit (Bldg. 581) (ST-26A) was operated by HMT-302 for temporary storage of hazardous waste. It was constructed in 1991. This unit consisted of a fenced concrete pad with a sump within a 6-inch concrete berm. Wastes were stored on wooden pallets in 5- to 55-gallon, DOT-approved standard hazardous waste drums. A catch sump (2 by 2 feet) was located within the unit. The unit measured 42 by 24 feet. According to the VSI, the overall integrity of the unit was good. Wastes stored at this unit included filters, oil, hydraulic oil, lube oil, fuel and oil filters, solvent, and oily rags.	RCRA AOC ST-26A Closure by RAC under RCRA; No RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 04/21/00)	4
ST-26B	10	This is the former site (with plastic line and sandbags) for the temporary storage of hazardous waste (ST-26A) and was situated northeast of the new site (ST-26A), approximately 60 feet away from Bldg. 581. Wastes stored at this unit included filters, oil, hydraulic oil, lube oil, fuel and oil filters, solvent, and oily rags.	RCRA AOC ST-26B Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete Complete (Letter 09/24/99)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
ST-27	10	Closed. This unit (north of Bldg. 581) was a steel locker operated by HMT-320 for storage of wash rack gear. Aircraft soap was stored at this site in the past. Prior to storage of aircraft soap, this site was probably used to store hazardous materials based on the containment system used. The unit was constructed in 1989. Temporary containment consisted of plastic liners and sandbags around the steel vault. The containment area was 34 by 16 feet. The overall integrity of the unit was fair, and the integrity of the temporary containment was moderate. Dates of operation were 1989 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-28A	10	Removed. This unit (Bldg. 582) (ST-28A) was operated by MALS-16 for temporary storage of hazardous waste. It was constructed in 1989. The unit consisted of a 17- by 17-foot, fenced concrete pad with a 6-inch berm. Waste materials were stored on wooden pallets in 5- to 55-gallon, DOT-approved, standard hazardous waste drums. A catch sump (2 by 2 feet) was located within the unit. According to the VSI, the overall integrity of the unit was good. Prior to construction of this unit, a former site (ST-28B) located east of Bldg. 582 was being used for the same purpose. The former storage unit (ST-28B) was constructed of a plastic liner with a sandbag berm. Wastes stored at the unit included fuel oil, hydraulic fluid, combustible liquid, and oily rags. Dates of operation were 1989 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-76	10	Closed. This unit (Bldg. 599) was built in 1992 and was operated by HMH-361 for temporary storage of hazardous materials. The unit was constructed of a concrete pad with a sump within a 6-inch berm. Dates of operation were 1992 to 1995.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	1
ST-89	10	Inactive. This unit (Bldg. 520) was operated by MAG-16. Helicopter Squadron. It was constructed in 1987. The unit was specifically designed to store, repair, and maintain helicopters.	RCRA AOC Closure by RAC under RCRA Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
TOW-06	10	Closed. Underground O/W SEP-508 (also known as SI-2B) located near Bldg. 508 operated by MALS-16. The 200-gallon steel unit was constructed in 1984 and was used for separating oil and wastewater generated from washing helicopters in adjacent wash area MWA-05 (Bldg. 517). The O/W SEP was connected to an underground tank for storage of separated waste oil prior to off-site disposal (UST-508 [SI-2A]). Prior to construction of this O/W SEP, a Type B O/W SEP was used. Waste oil was kept in the separator for later disposal, and water was discharged directly to a storm drain. The former system was equipped with an alarm to warn of overflow into the sanitary sewer system.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 03/09/00)	1
TOW-19	10	Inactive. This was a 1,000-gallon steel O/W SEP-520 located south of Bldg. 520. The unit had no storage tank for the separated waste oil. The waste oil remained in the unit until it was pumped out and disposed of off-site. The wastewater from the unit was discharged into the sanitary sewer. The unit was equipped with an overflow alarm. Oily water was generated from cleaning mechanical equipment at wash rack MWA-21 (Bldg. 520).	RCRA AOC Closure by RAC under RCRA NFA concurrence	 Complete (Letter 02/22/01)	4
SAT-14	11	No information was found documenting the existence of this AOC.	RCRA AOC NFA concurrence	 Complete (Letter 09/16/96)	1
AMS-03	12, 40	Stains were identified 330 feet from the east side of Hangar No. 29 in an aerial photo dated February 1953. The photos taken after 1953 are not focused enough for identification of the stains. The area is currently located adjacent to an asphalt semicircle area (280 feet in diameter) and Windmill Road. No stain was observed during the inspection. The asphalt area is covered with cracks and surrounded by grass (42 feet wide).	RCRA AOC NFA concurrence	 Complete (Letter 04/22/96)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
DSD-03	12	Drainage adjacent to MWA-10 (Bldg. 231), an active wash area and O/W SEP-273 (TOW-09) that replaced Bldg. 288. Discharge line from MWA-10 had automatic valve system to direct wastewater to TOW-09. From TOW-09, wastewater flowed to the sanitary sewer system and oily waste flowed to adjacent UST-273. Overflow during storm events may have discharged to open storm drain. Pre-1985 washwater flowed directly into the storm drain. This portion of the storm drain also received discharge from the open area around Buildings 180, 181, 182, 239, 241, 244, 583, and 584 to the north of MWA-10. The Second Addendum to the revised PR/draft VSI identified an extension to this AOC, consisting of two sites (Sites 11 and 16) within the open area around Buildings 180, 181, 182, 239, 241, 244, 583, and 584 in which aircraft runoff, dumping of flight line wastes, waste oil spillage, and drum storage occurred. Site 11 consisted of the trenches (drainage ditches) behind the buildings and the area between Bldg. 180 and Parking Apron No. 2. The trenches reportedly received aircraft wash runoff and were used as a dumping site for all flight line hazardous wastes. Reportedly, 55-gallon drums of waste oil spillage and approximately two liters of JP-5 fuel per aircraft per day were dumped at Site 11. Site 16 is a 20- by 50-foot area NE of Bldg. 241 near Bldg. 182. This site was used, prior to 1971 and through at least 1978, to dump fuels, hydraulic fluids and other wastes on a daily basis. Historical aerial photographs encompassing the DSD-03 extension document disturbed or stained ground and show drum storage.	RCRA AOC RFA conducted Final RFA report (04/97): soil removal recommended Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete Complete (Letter 02/22/01)	4
MAE-02	12	Inactive. The unit was a spray paint booth at Bldg. 537 operated by MALS-16 to paint support equipment and automobile parts. The unit was reportedly installed in approximately 1991. Hazardous release (air emissions) was restricted by use of a modified ventilation system (Viskon Air Filter System) that filtered outgoing air before it was discharged to the atmosphere. It was periodically checked/monitored and certified for operation by an industrial hygienist. A release prevention system was in place and prevented operation of spray guns while the doors to the unit were open. The overall integrity of the unit was good and it was permitted by the SCAQMD under Permit No. D79123. Dates of operation were 1991 to 1999.	RCRA AOC Closure by RAC Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	1
MAE-07	12	Inactive. This unit was a spray booth at Bldg. 251 operated by MWSS-374 under SCAQMD Permit No. M51450 for painting support equipment and automobile parts until 1999. Hazardous release (air emissions) was restricted by use of a modified ventilation system that filtered outgoing air prior to discharge to the atmosphere. The overall integrity of the unit was good.	RCRA AOC Closure by RAC by RCRA NFA concurrence	 Complete (Letter0 3/29/01)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
MWA-10	12	Inactive. Wash area (Bldg. 231) was operated by MALS-16 for cleaning test cell equipment. The unit was constructed in 1974 and was used twice per week. The wash area consisted of a 115- by 73-foot concrete pad sloped to a drain. Oily water flowed through the drain into O/W SEP-273 (TOW-09). The integrity of the concrete pad appeared to be good. Before the O/W SEP was installed in 1985, washwater had been discharged to the storm drain system.	RCRA AOC Closure by RAC under RCRA Closure Report (12/00): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	1
MWA-11A,B	12	Inactive. Wash area west of Bldg. 546 consisted of a 29- by 20-foot concrete pad connected to an O/W SEP-546 (TOW-10).	RCRA AOC RFA conducted Closure by RAC under RCRA Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 06/22/00)	1
ST-11A	12	Closed. This unit (Bldg. 586) was operated by MALS-16 for temporary storage (less than 90 days) of hazardous waste. The integrity of the entire unit appeared to be good. This unit replaced the storage area for Buildings 546 and 190 (ST-11B). Wastes stored at this unit included petroleum oil, lubricant oil, sandbags generated from demolishing the former unit located at this location, batteries, and cleaning solvents. Dates of operation were 1991 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-11B	12	Closed. This unit (southwest of Bldg. 546) was operated by MALS-16 for temporary storage of hazardous waste generated from Buildings 546 and 190. The unit was demolished in 1991 and was replaced by a temporary storage unit at Bldg. 586 (ST-11A), also operated by MALS-16. Drums were stored on a plastic tarp with a sandbag berm for containment. The area became an asphalt parking lot. Wastes stored at this unit included petroleum oil, lubricant oil, batteries, and cleaning solvents.	RCRA AOC Closure by RAC under RCRA; No RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	3
ST-28B	12	Removed. This unit (Bldg. 582) (ST-28A) was operated by MALS-16 for temporary storage of hazardous waste. It was constructed in 1989. The unit consisted of a 17- by 17-foot, fenced concrete pad with a 6-inch berm. Waste materials were stored on wooden pallets in 5- to 55-gallon, DOT-approved, standard hazardous waste drums. A catch sump (2 by 2 feet) was located within the unit. According to the VSI, the overall integrity of the unit was good. Prior to construction of this the unit, a former site (ST-28B) located east of Bldg. 582 was being used for the same purpose. The former storage unit (ST-28B) was constructed of a plastic liner with a sandbag berm. Wastes stored at the unit included fuel oil, hydraulic fluid, combustible liquid, and oily rags. Dates of operation were 1989 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter (09/24/99)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
ST-34A	12	Inactive. This unit (Bldg. 591) was operated by MALS-16 for temporary storage (less than 90 days) of hazardous wastes. The unit was constructed in 1991. Wastes were stored in 5- to 55-gallon drums on a 27- by 27-foot, fenced concrete pad with a 6-inch concrete containment berm. A catch sump (2 by 2 feet) was located inside the unit. The overall integrity of the unit was good. This unit replaced a former storage area (ST-34B) that was constructed of a plastic tarp with a sandbag berm. Wastes stored at this unit included synthetic hydraulic fluids, corrosion preventative compounds, adhesives, flammable liquids, desiccant poison, MEK, and toluene. Dates of operation were 1991 to 1999.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 04/21/00)	4
ST-34B	12	Removed. This unit (paved area north of Bldg. 591) was used for temporary storage of hazardous waste and was operated by HMH-363. The storage area consisted of a plastic liner and sandbags. In 1991, this site was decommissioned and replaced with Bldg. 591 (ST-34A). Wastes stored at this unit included hydraulic fluids and other various chemicals.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter (09/24/99)	4
ST-69	12	Incorrectly identified in the PR as a hazardous materials storage unit. At the time of the VSI, no hazardous waste was being stored at this site. The area was an engine test cell near B-273. According to activity personnel, no hazardous wastes were stored in this area in the past.	RCRA AOC NFA concurrence	 Complete (Letter 04/22/96)	1
ST-74	12	According to the EBS for CERFA, a storage unit was associated with MWA-10. Upon field inspection, it was determined that there was no storage unit associated with the washpad.	RCRA AOC NFA concurrence	 Complete (Letter (09/16/96)	1
TOW-09A	12	Removed. Underground 450-gallon steel O/W SEP-273 (also known as SI-3B) was located northeast of Bldg. 273 and was used by MALS-16. Used for separating oil and wastewater generated from cleaning aircraft engine test cell equipment in the adjacent wash area MWA-10 (Bldg. 231). The O/W SEP was connected to a 550-gallon, double-walled UST (UST-273, also known as SI-3A) for separated waste oil prior to disposal. The system was equipped with a high/low alarm to warn of overflow into the sanitary sewer system. Oily water with detergents and possibly solvents was generated from cleaning operations in the adjacent wash area.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	4
TOW-09B	12	Removed. Primary separator within drain box.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
TOW-09C	12	Removed. Secondary separator located within drain pipeline.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (12/00): NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	4
TOW-10	12	Removed. O/W SEP-546 was a 500-gallon concrete unit located near Bldg. 546, 20 feet west of the electronic transformer yard, and was operated by MALS-16 Avionics. Used for separating oil and wastewater generated from the adjacent wash area MWA-11 (W. of Bldg. 546). No monitoring system was in place.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report: NFA recommended NFA concurrence	 Complete Complete Complete (Letter 06/22/00)	4
MWA-19	14	Inactive. Wash rack (Bldg. 543) used for washing helicopters. The unit was operated by MALS-16 and was installed in October 1986. The unit consisted of an 87- by 80-foot concrete pad sloped toward its center and surrounded by a 6-inch concrete berm for containment. The unit was connected to O/W SEP-543 (TOW-17). The overall integrity of the unit appeared to be good. A series of steel grills was installed above the drains leading to the O/W SEP. Dates of operation were 1986 to 1999.	RCRA AOC Closure by RAC under RCRA Closure Report (12/00): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	1
TOW-17	14	Removed. This 5,000-gallon steel underground O/W SEP-543 was located near the southwest corner of Bldg. 543, an aircraft rinse facility operated by MALS-16. The O/W SEP was connected to a 1,000-gallon fiberglass underground tank (UST-543) for storage of separated waste oil prior to off-site disposal. The waste oil was pumped from the tank and disposed of off-site, and the wastewater was discharged into the sanitary sewer system. Oily water with detergents was generated from washing helicopters at adjacent wash area MWA-19. The quantity of wastewater varied.	RCRA AOC Closure by RAC under RCRA Closure Report (12/00): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 02/22/01)	1
AMS-05	32, 40	A dark circular area (approximate diameter 165 feet) 200 feet east of the edge of Pad No. 3, and a similar dark circular area 300 feet east of Kilpatrick Road and 450 feet north of Moffett Road, were identified in an aerial photograph dated February 1953. Both areas may have been caused by a spill or intentional releases. Field investigations conducted by Jacobs Engineering Group in 1992, and again in 1994 as part of the EBS for final CERFA, concluded that there had not been a release to the environment.	RCRA AOC No SV conducted NFA concurrence	 Complete Complete (Letter 09/16/96)	1

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
MWA-06	15, 40	Inactive. The unit was a wash pad (Bldg. 229) next to Building 551 which was operated by MALS-16 and was used to contain oily wash water generated during the cleaning of helicopters. The wash area was constructed in the 1950s and consisted of a 105- by 92-foot concrete pad sloped to a drain and surrounded by a 6-inch concrete berm. Oily water flowed through the drain into an O/W SEP-551 (TOW-07), which was connected to UST-181 (removed) for storage of separated waste oil prior to off-site disposal. Wastewater was discharged to the sanitary sewer system. The integrity of the concrete pad appeared to be good. Dates of operation were 1950s to 1996.	RCRA AOC Closure by RAC under RCRA; RA required Closure report (02/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 10/14/99)	4
ST-29	40	Closed. This unit (Bldg. 583) was operated by HMM-268 and HMT-30 for temporary storage of hazardous waste. The unit was constructed in 1989 and consisted of a 100- by 23-foot, fenced concrete pad with a 6-inch berm. The unit had two equal sections, separated by a 6-inch concrete berm, where drums were stored from HMM-268 and HMT-301. Waste materials were stored on wooden pallets in 5- or 55-gallon, DOT-approved, standard hazardous waste drums. A catch sump (2 by 2 feet) was located within each section of the unit. According to the VSI, the overall integrity of the unit was good. Wastes stored at this unit included JP-5 fuel, hydraulic fluid, dirty and oily rags, Speed-Dry absorbent, Freon, polyurethane, rags contaminated with solvent, and absorbent. Dates of operation were 1989 to 1994.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-30	40	Closed. This unit (south of Bldg. 182 and northeast of Bldg. 29) was operated by HMT-166 for temporary storage of drums containing hazardous materials. The unit was built in 1990. It was surrounded by a fence and bermed with sandbags and had a plastic liner for containment. According to the VSI, the overall integrity of the system was good and no waste was stored at the unit. Hazardous materials stored at this unit included transmission oil, grease, isopropyl alcohol, lubricating oil, propellant propane, and corrosion preventative oil. Dates of operation were 1990 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-32A	40	Closed. Unit ST-32A (Bldg. 598) was built in 1992 and was operated by HMM-268 for temporary storage of hazardous materials. The unit was constructed of a concrete pad with a sump and a 6-inch berm. Hazardous materials stored at this unit included aircraft cleaning compound, engine gas, and path cleaner. Dates of operation were unknown to 1995.	RCRA AOC Closure by RAC under RCRA; No RA required Closure report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

AOC[a]	Parcel	Description	Status	Status Summary[b]	ECP Area Type[c]
ST-32B	40	Closed. Unit ST-32B was the former dirt area under Bldg. 598 used for storage of drummed materials prior to construction of Bldg. 598. Hazardous materials stored at this unit included aircraft cleaning compound, engine gas, and path cleaner. Dates of operation were unknown to 1995.	RCRA AOC Closure by RAC under RCRA; No RA required Closure report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-32C	40	Closed. Unit ST-32C was a former hazardous materials storage unit (east of Bldg. 180) operated by HMM-268. The unit was built in 1989. The unit was an 11- by 15-foot wooden bldg. The VSI reported that the overall integrity of the system and containers was good. Hazardous materials stored at this unit included aircraft cleaning compound, engine gas, and path cleaner. Dates of operation were unknown to 1995.	RCRA AOC Closure by RAC under RCRA; No RA required Closure report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
ST-33	40	Operated by HMM-268 for temporary storage of drums containing hazardous waste. However, at the time of the VSI, no waste was stored on site. The unit was built in 1989. The unit consisted of an 11- by 11- foot wooden storage shack with no containment. The overall integrity of the system appeared to be poor. Hazardous waste stored at this unit included JP-5 fuel, hydraulic fluids, and Speedy-Dry absorbent. Dates of operation were 1989 to 1995.	RCRA AOC Closure by RAC under RCRA; RA required Closure Report (09/99): NFA recommended NFA concurrence	 Complete Complete Complete (Letter 09/24/99)	4
TOW-07	40	Removed. Underground O/W SEP-551 was located near Buildings 551 and 181. The 200-gallon steel tank was constructed in 1989 and was used for separating oil and wastewater generated from the adjacent wash area MWA-06 (Bldg. 551). The O/W SEP was connected to a 100-gallon UST (UST-181) (removed) for storage of separated waste oil prior to off-site disposal. Prior to construction of this O/W SEP, an old sand trap O/W SEP was used. The system was equipped with a high/low alarm to warn of overflow into the sanitary sewer. Dates of operation were 1989 to 1997.	RCRA AOC Removed (06/97); RA required Closure report: NFA Recommended NFA concurrence	 Complete Complete Complete (Letter 11/16/00)	4

Notes:

[a] no AOCs are located within Parcels 25, 26, 30, 31, 33, 37, 41, or 42

[b] unless otherwise noted, the NFA concurrence letters referred to in the Status Summary column are signed by the BRAC Environmental Coordinator, the US EPA Project Manager, the RWQCB Project Manager, and the Cal-EPA, DTSC Project Manager

[c] see Table 4 for definitions of ECP area types

Table 2 (continued)
Former AOCs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Acronyms/Abbreviations:

AD	- air photo, possible disposal
AMS	- air photo, miscellaneous, stain, possible spill
AOC	- area of concern
AST	- air photo, storage, possible aboveground tank
BCT	- Base realignment and closure Cleanup Team
Bldg.	- building
BRAC	base realignment and closure
Cal-EPA	- California Environmental Protection Agency
CERCLA	- Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERFA	- Community Environmental Response Facilitation Act of 1992
DOT	- Department of Transportation
DSD	- disposal, storm drain
DTSC	- Cal-EPA Department of Toxic Substances Control
EBS	- environmental baseline survey
ECP	- environmental condition of property
HMH	- heavy medium helicopter
HMM	- Marine Medium Helicopter Squadron
HMT	- Marine Helicopter Training Squadron
IR	- Installation Restoration
JP-5	- jet propellant grade 5
MAE	- miscellaneous, air emissions
MAG	- Marine Aircraft Group
MALS	- Marine Aviation Logistics Squadron
MATCS	- Marine Air Traffic Control Squadron
MAW	- miscellaneous, abandoned well
MCAS	- Marine Corps Air Station
MEK	- methyl ethyl ketone
MFL	- miscellaneous, fuel line
MGR	- miscellaneous, grease rack
MMS	- miscellaneous, major spill
MWA	- miscellaneous, wash area
MWSS	- Marine Wing Support Squadron
NFA	- no further action
No.	- number
OU	- operable unit
O/W SEP	- oil/water separator
PCA	- petroleum corrective action
POL	- petroleum, oil, and lubricant
PR	- preliminary review
RA	- remedial action
RAC	- remedial action contract
RAP	- remedial action plan
RCRA	- Resource Conservation and Recovery Act
RFA	- RCRA facility assessment
RI	- remedial investigation
ROD	- Record of Decision
RWQCB	- Regional Water Quality Control Board
SARWQCB	- Santa Ana Regional Water Quality Control Board
SAT	- storage, aboveground tank
SCAQMD	- South Coast Air Quality Management District
ST	- storage, temporary
SV	- site visit
TOW	- treatment, oil/water separator
US EPA	- United States Environmental Protection Agency
UST	- underground storage tank
VSI	- visual site inspection

Table 3
Former USTs and ASTs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

UST/AST	Location	Description	Status	ECP Area Type*
UST-536	Parcel 5	150-gallon fiberglass waste oil UST associated with O/W SEP-536. Installed in 1988 and removed 19 March 1999.	Tank decommissioned in December 1998. NFA approval BCT 18 May 2000.	1
UST-530A	Parcel 7	2,000-gallon steel diesel UST. Installed in 1988 and removed 15 September 1997. Excavation not required; no contamination detected. Work conducted under RAC (DO No. 51)	Closure report issued 20 February 1998. NFA approval OCHCA 18 March 1998.	1
UST-530B	Parcel 7	1,000-gallon fiberglass waste oil UST with monitoring system associated with O/W SEP-530. Installed in 1988 and removed 10 July 1998.	Closure report complete. NFA approved BCT 09 December 1999.	1
AST-198A (SAT-2A)	Parcel 8	30,000-gallon steel JP-5 AST removed 09 April 1998.	Closure Report complete (29 January 1999. NFA approval RWQCB 03 May 2001.	2
AST-198B (SAT-2B)	Parcel 8	30,000-gallon steel JP-5 AST removed 09 April 1998.	Closure Report complete (29 January 1999. NFA approval RWQCB 03 May 2001.	2
UST-508 (also known as SI-2A)	Parcel 10	100-gallon steel waste oil UST with monitoring system and associated with O/W SEP-508 (SI-2B). Installed in 1985 and removed December 1998.	Tank removed December 1998. NFA approval BCT 09 March 2000.	1
AST-537 (SAT-11)	Parcel 10	1,000-gallon steel solvent waste AST removed June 1997.	Closure Report issued 09 June 1998. NFA approval RWQCB 15 May 2000.	1
UST-273 (SI-3A)	Parcel 12	300-gallon fiberglass waste oil UST with monitoring system associated with O/W SEP-273 (SI-3B). Installed in 1987 and removed June 1999.	NFA approval BCT 22 February 2001	1
AST-273A (SAT-9)	Parcel 12	500-gallon steel JP-5 AST removed 05 April 1999.	Closure Report issued 07 December 2000. NFA approval RWQCB 17 January 2001.	1
AST-273B (SAT-10)	Parcel 12	500-gallon steel JP-5 AST removed 05 April 1999.	Closure Report issued 07 December 2000. NFA approval RWQCB 17 January 2001.	1
UST-543	Parcel 14	1,000-gallon steel waste oil UST with monitoring system associated with O/W SEP-543. Installed in 1988 and removed 02 June 1999.	NFA approval BCT 22 February 2001	1

Table 3 (continued)
Former USTs and ASTs Located Within Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

UST/AST	Location	Description	Status	ECP Area Type*
AST-24C	Parcel 33	360-gallon heating fuel AST. Removed, no contaminants detected.	Draft Closure Report issued 23 July 1996. NFA approval RWQCB 26 November 1997.	1
UST-181	Parcels 15 and 40	800-gallon steel waste oil UST associated with O/W SEP-551 (removed). Installed in 1967 and removed 10 June 1997.	Closure Report issued 02 January 1998. NFA approval RWQCB 21 January 1998.	1

Note:
* see Table 4 for definitions of ECP area types

Acronyms/Abbreviations:
AST – aboveground storage tank
BCT – Base Realignment and Closure Cleanup Team
DO – delivery order
ECP – environmental condition of property
JP-5 – Jet fuel
NFA – no further action
No. – number
OCHCA – Orange County Health Care Agency
O/W SEP – oil/water separator
RAC – remedial action contract
RWQCB – Regional Water Quality Control Board
SAT – storage/aboveground tank
UST – underground storage tank

Table 4
Department of Defense
Environmental Condition of Property Area Types*

Area Type	Description
1	Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)
2	Areas where only release or disposal of petroleum products has occurred
3	Areas where release of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action
4	Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken
5	Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken
6	Areas where release, disposal, and/or migration of hazardous substances has occurred, but required response actions have not yet been implemented
7	Areas that have not been evaluated or require additional evaluation

Note:

* according to the Department of Defense BRAC Cleanup Plan Guidebook (DoD 1996), properties classified as Area Types 1 through 4 may be considered suitable for transfer, and properties classified as Area Types 5 through 7 are considered unsuitable for transfer

Acronyms/Abbreviations:

BRAC - base realignment and closure
DoD - Department of Defense

Table 5
Environmental Factors Considered
Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Environmental Factors May Pose Restrictions or Require Notification?		*Environmental Factors Considered*
No	Yes	
X		Hazardous substances (notification)
X		Areas of concern
X		Medical/biohazardous wastes
X		Oil/water separators
X		Monitoring wells
X		Unexploded ordnance
X		Petroleum products and derivatives
X		Radioactive & mixed wastes
X		Storage tanks (USTs/ASTs)
	X	Pesticides/herbicides applications
	X	Asbestos
X		Drinking water quality
X		Indoor air quality
	X	Lead-based paint
	X	Polychlorinated biphenyls
	X	Radon
X		Air conformity/air permits
X		Coastal zones
X		Energy (utilities)
	X	Flood plains
X		Groundwater use/subsurface excavation
X		Hazardous waste management (by lessee)
	X	Historic property (archeological/Native American, paleontological)
X		Occupational Safety & Health Administration
X		Outdoor air quality
	X	Prime/unique farmlands
X		Sanitary sewer systems (wastewater)
X		Sensitive habitat
X		Septic tanks (wastewater)
X		Solid waste
X		Threatened and endangered species
X		Transportation
	X	Wetlands

Acronyms/Abbreviations:

AST – aboveground storage tank

UST – underground storage tank

Table 6
Results of PCB Transformer Surveys and PCB Equipment Inspection in Buildings
Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37,
Portions of 40 and 41, and 42

Building	Parcel	Proposed Disposition	Year Built	Associated Transformer?	Location	ID No.	Max PCB. Content* (ppm)	PCB Equipment Inspection Performed?	Inspection Report Date	PCB-Containing Equipment Present?	Location	Corrective Action
176	4	Demolition	1967	Yes	On adjacent pad (Structure 237)	11107-1, K0328	0	Yes	1992	No	NA	NA
527	4	Demolition	1988	Yes	On adjacent pad	TYPE-QL	0	Yes	1992	No	NA	NA
531	4	Demolition	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
532	4	Demolition	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
525	5, 40	Demolition	1988	No	NA	NA	NA	Yes	1992	Yes	Small capacitor	None required
536	5	Demolition	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
528	7	Reuse	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
529	7	Reuse	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
530	7	Reuse	1988	No	NA	NA	NA	Yes	1992	No	NA	NA
255	8	Demolition	1984	Yes	On adjacent pad	CF0108004	2	Yes	1992	No	NA	NA
508	10	Demolition	1985	Yes	On adjacent pad	None identified	0	Yes	1992	No	NA	NA
520	10	Reuse	1987	Yes	On adjacent pad	M154506	0	Yes	1992	No	NA	NA
537	10, 12, 40	Demolition	1987	Yes	On adjacent pad	M154507	0	Yes	1992	No	NA	NA
568	11, 12, 40	Demolition	1990	Yes	Pad on west side of bldg.	90V6554	1	Yes	1992	No	NA	NA
220	12	TBD	1977	Yes	On adjacent pad	GM3262204	0	Yes	1992	No	NA	NA
273	12	Reuse	1987	Yes	On adjacent pad	084-50562	0	Yes	1992	No	NA	NA
544	12	Demolition	1989	No	NA	NA	NA	Yes	1992	No	NA	NA
545	12	Demolition	1989	No	NA	NA	NA	No	NA	NA	NA	NA
546	12	Reuse	1989	Yes	Pad	880408-A1	1	Yes	1992	No	NA	NA

Table 6 (continued)
Results of PCB Transformer Surveys and PCB Equipment Inspection in Buildings
Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37,
Portions of 40 and 41, and 42

Building	Parcel	Proposed Disposition	Year Built	Associated Transformer?	Location	ID No.	Max PCB. Content* (ppm)	PCB Equipment Inspection Performed?	Inspection Report Date	PCB-Containing Equipment Present?	Location	Corrective Action
568	11, 12, 40	Demolition	1990	Yes	Pad on west side of bldg.	90V6554	1	Yes	1992	No	NA	NA
180	40	Demolition	1967	No	NA	NA	NA	Yes	1992	No	NA	NA
181	40	Demolition	1967	No	NA	NA	NA	Yes	1992	No	NA	NA
182	13, 40	Demolition	1967	Yes	On adjacent pads	M121982YMMA, M121985YMMA, M125125YMMA	0	Yes	1992	No	NA	NA
244	40	Demolition	1981	No	NA	NA	NA	Yes	1992	No	NA	NA
551	40	Demolition	1984	No survey	NA	NA	NA	No	NA	NA	NA	NA

Note:

* transformer data are provided in PWC 1996; PCB items and equipment inspection results are provided in Kennedy/Jenks Consultants 1992

Acronyms/Abbreviations:

ID - identification
Max. - maximum
NA - not applicable
No. - number
PCB - polychlorinated biphenyl
ppm - parts per million
PWC - Public Works Center
TBD - to be determined

Table 7
Results of Building ACM Surveys – Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Building	Parcel	Proposed Disposition	Year Built	ACM Survey Performed?	Survey Report Date[a]	ACM Found?	Location	Type Condition[b]
176	4	Demolition	1967	Yes	1991	Yes	Numerous locations	Hot water tank insulation (friable, good condition); pipe fitting insulation (friable, significantly damaged); duct wrap (significantly damaged); floor tile; carpet; fire door; roofing; spray-on surface coating.
527	4	Demolition	1988	No	NA	NA	NA	NA
531	4	Demolition	1988	No	NA	NA	NA	NA
532	4	Demolition	1988	No	NA	NA	NA	NA
525	5, 40	Demolition	1988	No	NA	NA	NA	NA
536	5	Demolition	1988	No	NA	NA	NA	NA
528	7	Reuse	1988	Yes	2001[c]	No[c]	NA	NA
529	7	Reuse	1988	Yes	2001[c]	No[c]	NA	NA
530	7	Reuse	1988	Yes	2001[c]	No[c]	NA	NA
255	8	Demolition	1984	No	NA	NA	NA	NA
508	10	Demolition	1985	No	NA	NA	NA	NA
520	10	Reuse	1987	Yes	2001[c]	No[c]	NA	NA
537	10, 12, 40	Demolition	1987	No	NA	NA	NA	NA
568	11, 12, 40	Demolition	1990	No	NA	NA	NA	NA
220	12	TBD	1977	Yes	1991, 2001[c]	Yes (1991)	Roofing (1991)	Nonfriable (1991); No FAD ACM observed in 2001
273	12	Reuse	1987	Yes	2001[c]	No[c]	NA	NA
537	10, 12, 40	Demolition	1987	No	NA	NA	NA	NA
544	12	Demolition	1989	No	NA	NA	NA	NA
545	12	Demolition	1989	No	NA	NA	NA	NA
546	12	Reuse	1989	Yes	2001[c]	No	NA	NA
568	11, 12, 40	Demolition	1990	No	NA	NA	NA	NA

Table 7 (continued)
Results of Building ACM Surveys – Parcels 4–8, 10–12, 14, 25, 26, 30–33, 37, Portions of 40 and 41, and 42

Building	Parcel	Proposed Disposition	Year Built	ACM Survey Performed?	Survey Report Date[a]	ACM Found?	Location	Type Condition[b]
Marble Mountain Park Housing Community	37	TBD	1984 - 1990	Yes	1995	Yes	Floor tile, including mastic (only in Marble Mountain Park 3)	Nonfriable
180	40	Demolition	1967	Yes	1991	Yes	Roofing	Nonfriable
181	40	Demolition	1967	Yes	1991	Yes	Roofing	Nonfriable
182	13, 40	Demolition	1967	Yes	1991	Yes	Roofing	Nonfriable
244	40	Demolition	1981	Yes	1991	Yes	Roofing	Nonfriable
525	5, 40	Demolition	1988	No	NA	NA	NA	NA
537	10, 12, 40	Demolition	1987	No	NA	NA	NA	NA
551	40	Demolition	1984	No	NA	NA	NA	NA
568	11, 12, 40	Demolition	1990	No	NA	NA	NA	NA

Notes:

[a] Ecology and Environment, Inc. 1991; Navy PWC 1995a,b,c,d,e; URS 2001
[b] reported ACM condition in survey report
[c] FAD ACM survey only (URS 2001)

Acronyms/Abbreviations:

ACM – asbestos-containing material
FAD – friable, accessible, and damaged
NA – not applicable
PWC – (Navy) Public Works Center
TBD – to be determined

Table 8
Monitoring Well and Surface Water Gauging Locations

Monitoring Well/Gauging Location	Parcel	Disposition
BMW10D[a]	8	Monitored quarterly
BMW10R[a]	8	Monitored quarterly
BMW10S[a]	8	Monitored quarterly
BMW13S[a]	11	Monitored quarterly
BMW02S[a]	26	Monitored quarterly
BMW02D[a]	26	Monitored quarterly
5SW06[c]	40	Monitored quarterly
BSW09[c]	41	Monitored quarterly
BMW11S[b]	7	Proposed for decommissioning
A000SB57S[b]	12	Proposed for decommissioning
A000SB49R[b]	12	Proposed for decommissioning
A000SB55S[b]	30	Proposed for decommissioning
A000SB56D[b]	31	Proposed for decommissioning
A000SB58S[b]	33	Proposed for decommissioning
A000SB59D[b]	33	Proposed for decommissioning
A000SB51R[a]	40	Monitored quarterly
A000SB50D2[a]	40	Monitored quarterly
ASB41D[a]	40	Monitored quarterly
ASB40S[a]	40	Monitored quarterly
BMW12S[b]	40	Proposed for decommissioning

Notes:

[a] water levels are measured quarterly in these monitoring wells
[b] these monitoring wells will be decommissioned before property transfer
[c] surface water gauging station – water level measured quarterly
[d] wells will be decommissioned following the procedures in the Draft Final Interim Basewide Groundwater Monitoring Plan (BNI 1997c).

Table 9
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
ALL	Access	Pursuant to CERCLA Section 120(h)(3)(A)(iii), the deed shall reserve and the transferee shall grant to the United States an appropriate right of access to enable the United States and others to enter Parcels 4-8, 10-12, 14, 25, 26, 30-33, 37, 42, and portions of 40 and 41 in any case which remedial action or corrective action is found to be necessary on the parcels or adjacent property after the date of property transfer.
ALL	Radon	Radon testing was conducted in 1991 at a representative number of housing units. No radon readings were measured above the U.S. EPA guidance level of 4 pCi/L.
ALL	ACM	Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.
ALL	LBP	Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.
4	PCBs	Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.
4	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Building 176 is restricted from occupancy prior to demolition based on the potential for FAD ACM, and the deed will indicate the transferee assumes responsibility for the management of ACM in accordance with applicable laws. Buildings 527, 531, and 532 are restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
4	LBP	Copies of the LBP survey reports will be included in the transfer documentation. Building 176 and Structure 237 will be restricted from use prior to demolition and the transferee will conduct post-demolition sampling of the soil and conduct any required abatement prior to occupancy of newly constructed buildings.

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
5	PCBs	A small capacitor, potentially containing PCBs, was found in Building 525 (partially located on this parcel). Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor. However, small capacitors may contain PCB-impregnated solid insulation. If the transferee plans to dispose of any equipment containing more than 50 ppm impregnated solid PCB, the PCB small capacitors in the motors should be processed as regulated items.
5	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Buildings 525 and 536 are restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
6	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
6	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
7	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Buildings 528, 529, and 530 may be transferred without restrictions for occupancy because no FAD ACM was found. However, the transferee must still assume responsibility for the management of ACM, if any.
7	LBP	Copies of the LBP survey reports will be included in the transfer documentation. No restrictions are required prior to and after demolition of Structure 611 based on LBP since this area did not have painted surfaces and the types of activities do not suggest previous use of LBP.
8	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
8	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
8	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Building 255 is restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
8	Well access	Access to background groundwater monitoring wells BMW10D, BMW10R, and BMW10S will be required after property transfer.
10	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Building 520 may be transferred without restrictions for occupancy because no FAD ACM was found. However, the transferee must still assume responsibility for the management of ACM, if any. Buildings 508 and 537 are restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
11	Wetlands	This parcel consists of 0.13 acres of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.
11	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Building 568 is restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
11	Well access	Access to background groundwater monitoring well BMW13S will be required after property transfer.
12	PCBs	Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.
12	Wetlands	Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
12	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Buildings 220, 273, and 546 may be transferred without restrictions for occupancy because no FAD ACM was found. However, the transferee must still assume responsibility for the management of ACM, if any. Buildings 537, 544, 545, and 568 are restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
12	LBP	Copies of the LBP survey reports will be included in the transfer documentation. No restrictions are required prior to and after demolition of Structures 205 and 231 based on LBP since this area did not have painted surfaces and the types of activities do not suggest previous use of LBP.
15	LBP	Copies of the LBP survey reports will be included in the transfer documentation. No restrictions are required prior to and after demolition of Structure 229 based on LBP since this area did not have painted surfaces and the types of activities do not suggest previous use of LBP.
25	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
25	Historic Property	The eastern portions of Blimp Mooring Mats 2 and 3 are located within the boundaries of this parcel. These mooring mats are eligible to be listed on the National Register of Historic Places. A 1999 Memorandum of Agreement among DON, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Disposal And Reuse of MCAS Tustin states that the mooring mates located in these transfer parcels do not have to be preserved after transfer.
25	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
25	LBP	Copies of the LBP survey reports will be included in the transfer documentation. No restrictions are required prior to and after demolition of Structures 604 and 605 based on LBP since this area did not have painted surfaces and the types of activities do not suggest previous use of LBP.

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
26	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
26	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
26	Well Access	Access to background groundwater monitoring wells BMW02S and BMW02D will be required after property transfer.
30	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
30	Historic Property	The eastern portion of Blimp Mooring Mat 5 is located within the boundaries of this parcel. These mooring mats are eligible to be listed on the National Register of Historic Places. A 1999 Memorandum of Agreement among DON, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Disposal And Reuse of MCAS Tustin states that the mooring mates located in these transfer parcels do not have to be preserved after transfer.
30	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
31	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
31	Historic Property	The eastern portion of Blimp Mooring Mat 5 is located within the boundaries of this parcel. These mooring mats are eligible to be listed on the National Register of Historic Places. A 1999 Memorandum of Agreement among DON, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Disposal And Reuse of MCAS Tustin states that the mooring mates located in these transfer parcels do not have to be preserved after transfer.
31	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
31	School Sites	Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the CEC section 17210 et.seq. will need to be conducted and approved by the Department of Toxic Substances Control (School Property Evaluation and Cleanup Division).

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
32	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
32	Prime Farmland	Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.
33	Pesticides	The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.
33	Flood Plains	This parcel is located within a flood zone. The area is classified by the FEMA Flood Insurance Rate Maps as a 100-year flood plain.
37	ACM	Copies of the ACM survey reports will be included in the transfer documentation. The Marble Mountain Park Housing Community is restricted from occupancy and the deed will indicate the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
37	LBP	Copies of the LBP survey reports will be included in the transfer documentation. There are no restrictions based on LBP at the Marble Mountain Park Housing Community located within this parcel.
40	PCBs	Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items. A small capacitor, potentially containing PCBs, was found in Building 525 (partially located on this parcel). Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor. However, small capacitors may contain PCB-impregnated solid insulation. If the transferee plans to dispose of any equipment containing more than 50 ppm impregnated solid PCB, the PCB small capacitors in the motors should be processed as regulated items.
40	Wetlands	Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.

Table 9 (continued)
Notifications and Restrictions Summary

Parcel No.	Environmental Factor	Notification/Restriction
40	ACM	Copies of the ACM survey reports will be included in the transfer documentation. Buildings 180, 181, 182, and 244 may be transferred without restrictions for occupancy because no ACM was found. However, the transferee must still assume responsibility for the management of ACM, if any. Buildings 525, 537, 551, and 568 are restricted from occupancy prior to demolition because no ACM surveys have been conducted. The deed will indicate that the transferee assumes responsibility for the management of ACM in accordance with applicable laws.
40	LBP	Copies of the LBP survey reports will be included in the transfer documentation. No restrictions are required prior to and after demolition of Structure 229 and 231 based on LBP since this area did not have painted surfaces and the types of activities do not suggest previous use of LBP. Buildings 180, 181, and 182 will be restricted from use prior to demolition and the transferee will conduct post-demolition sampling of the soil and conduct any required abatement prior to occupancy of newly constructed buildings.
40	Well Access	Access to background groundwater monitoring wells A000SB50D2, A000SB51R, ASB40S, and ASB41D and surface water gauging location 5SW06 will be required after property transfer.
41	Well Access	Access to surface water gauging location BSW09 will be required after property transfer.
42	Wetlands	This parcel consists of 0.88 acres of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.

Acronyms/Abbreviations:

ACM - asbestos-containing material
CEC - California education Code
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
DON - United States Department of the Navy
EIS/EIR - environmental impact statement/environmental impact report
FAD - friable, accessible, and damaged
FEMA - Federal Emergency Management Agency
LBP - lead-based paint
MCAS - Marine Corps Air Station
PCBs - polychlorinated biphenyls
PEA - preliminary endangerment assessment
pCi/L - picocuries per liter
ppm - parts per million
U.S. EPA - United States Environmental Protection Agency

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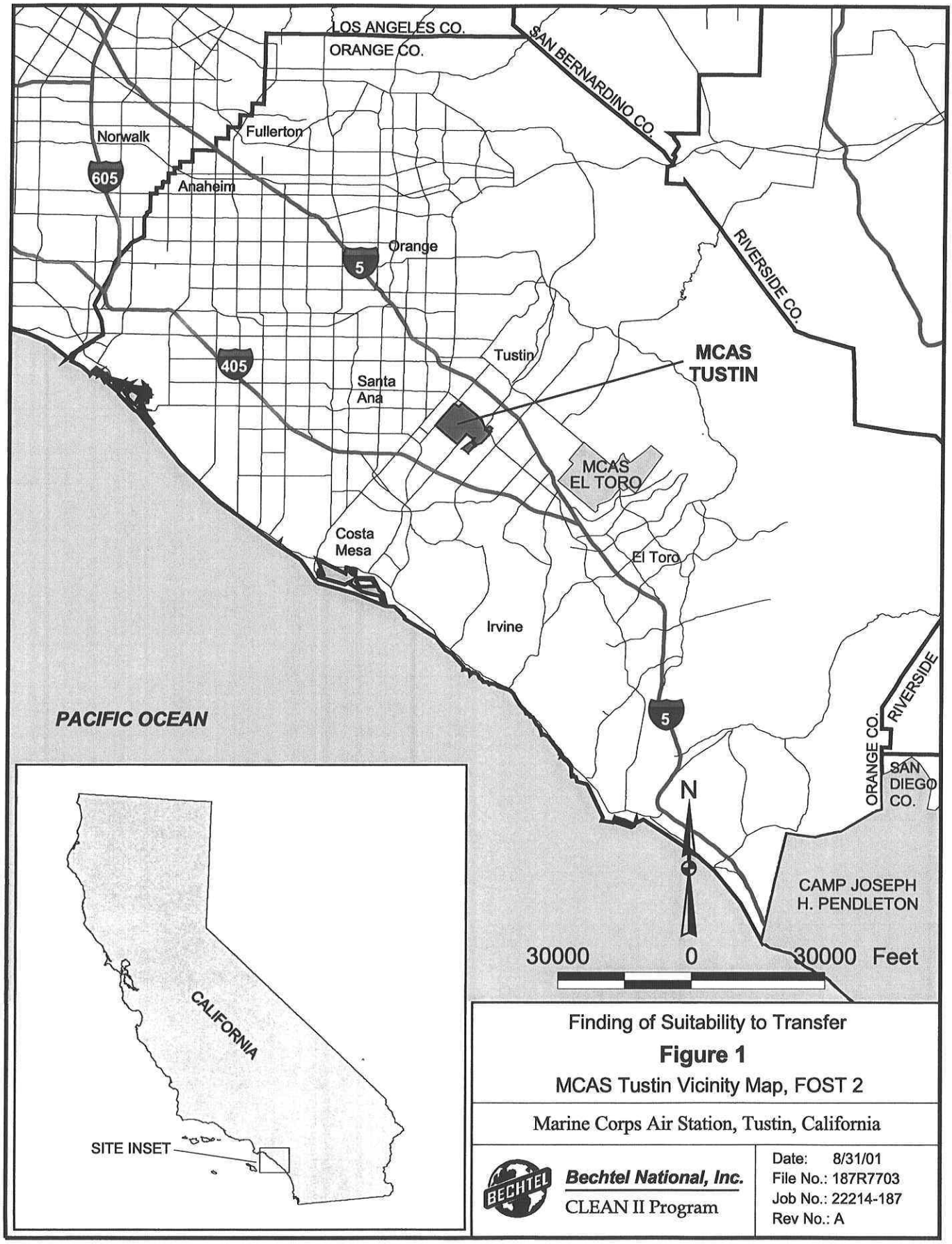
MCAS TUSTIN
SSIC # 5090.3

FIGURES

FINDING OF SUITABILITY TO TRANSFER FOR SOUTHERN PARCELS 4-8, 10-12, 14, AND 42 AND PARCELS 25, 26, 30-33, 37 AND PORTIONS OF 40 AND 41

DATED 28 SEPTEMBER 2001



Finding of Suitability to Transfer

Figure 1

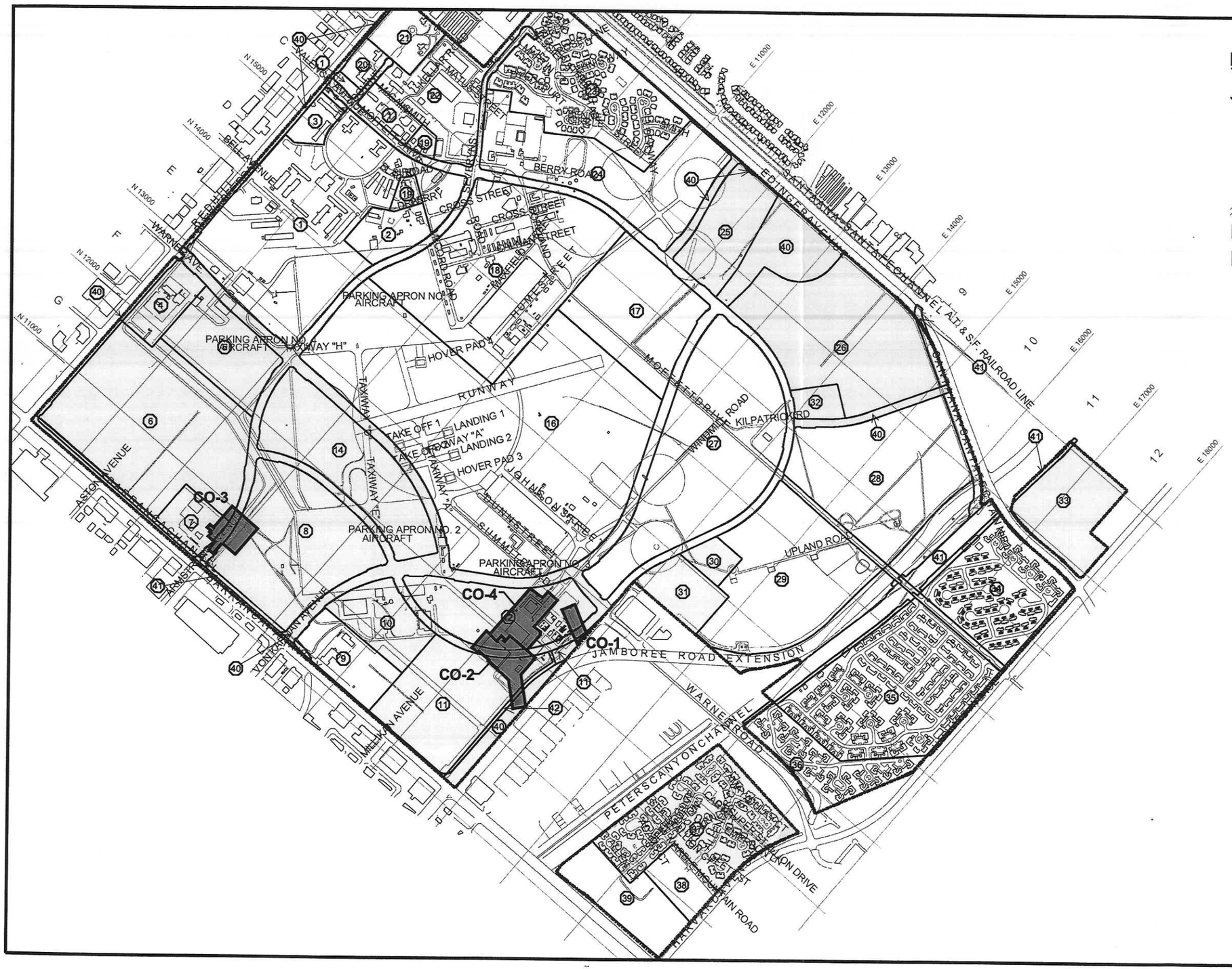
MCAS Tustin Vicinity Map, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.

CLEAN II Program

Date: 8/31/01
File No.: 187R7703
Job No.: 22214-187
Rev No.: A



LEGEND

- GOVERNMENT PROPERTY LINE
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT (CO) AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)
  - CO-1 : IRP-5S(b)
  - CO-2 : IRP-6 AND BUFFER ZONE
  - CO-3 : IRP-8 AND BUFFER ZONE
  - CO-4 : ARSENIC (AREA OF CONCERN)

NOTES:

1. ALL LOCATIONS ARE APPROXIMATE.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

1200 0 1200 Feet

Finding of Suitability to Transfer

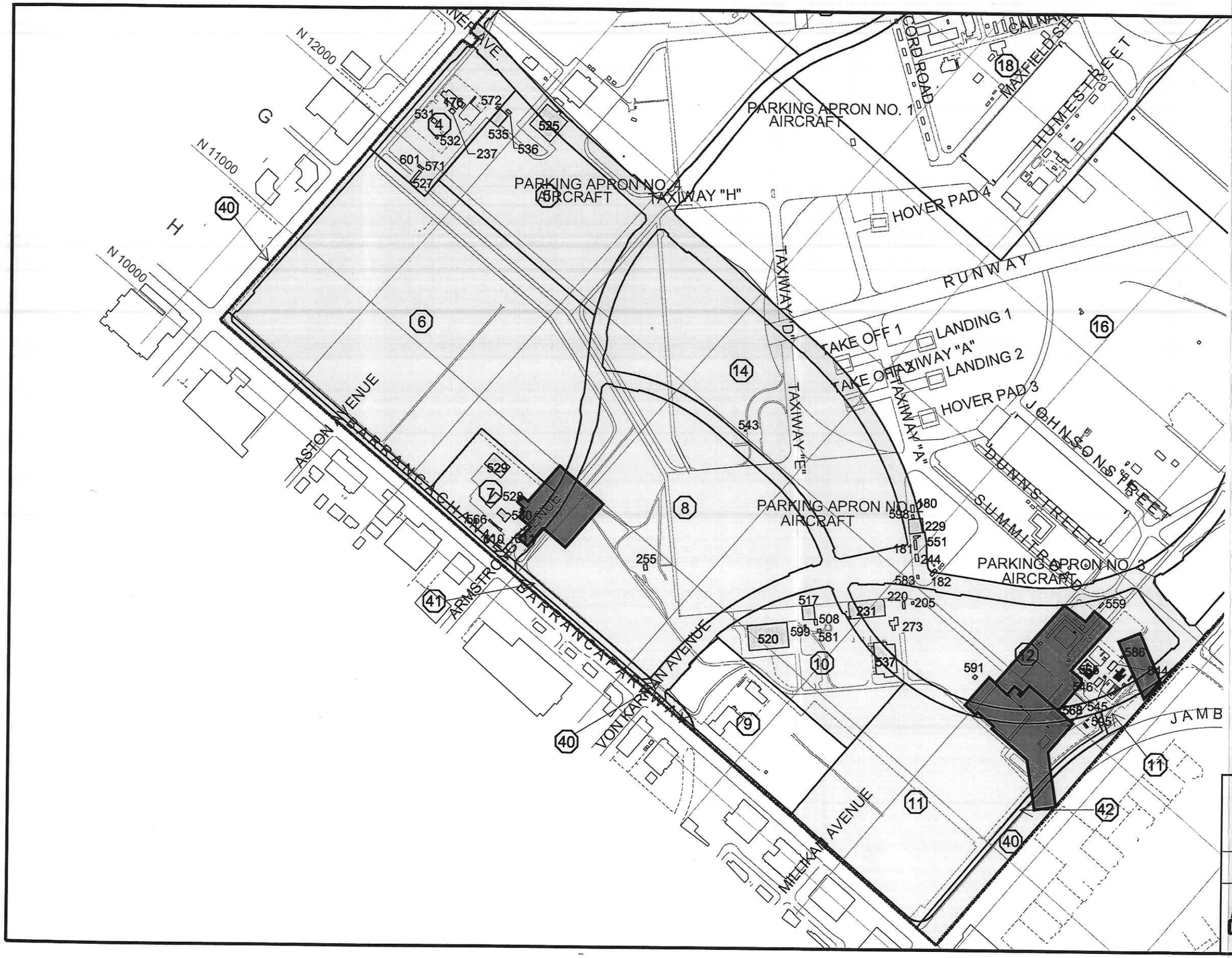
Figure 2

Transfer Property Location Map, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/31/01
File No.: 187L7695
Job No.: 22214-187
Rev No.: A



LEGEND

- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE IN THE TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)

NOTE:

ALL LOCATIONS ARE APPROXIMATE.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

700 0 700 Feet

Finding of Suitability to Transfer

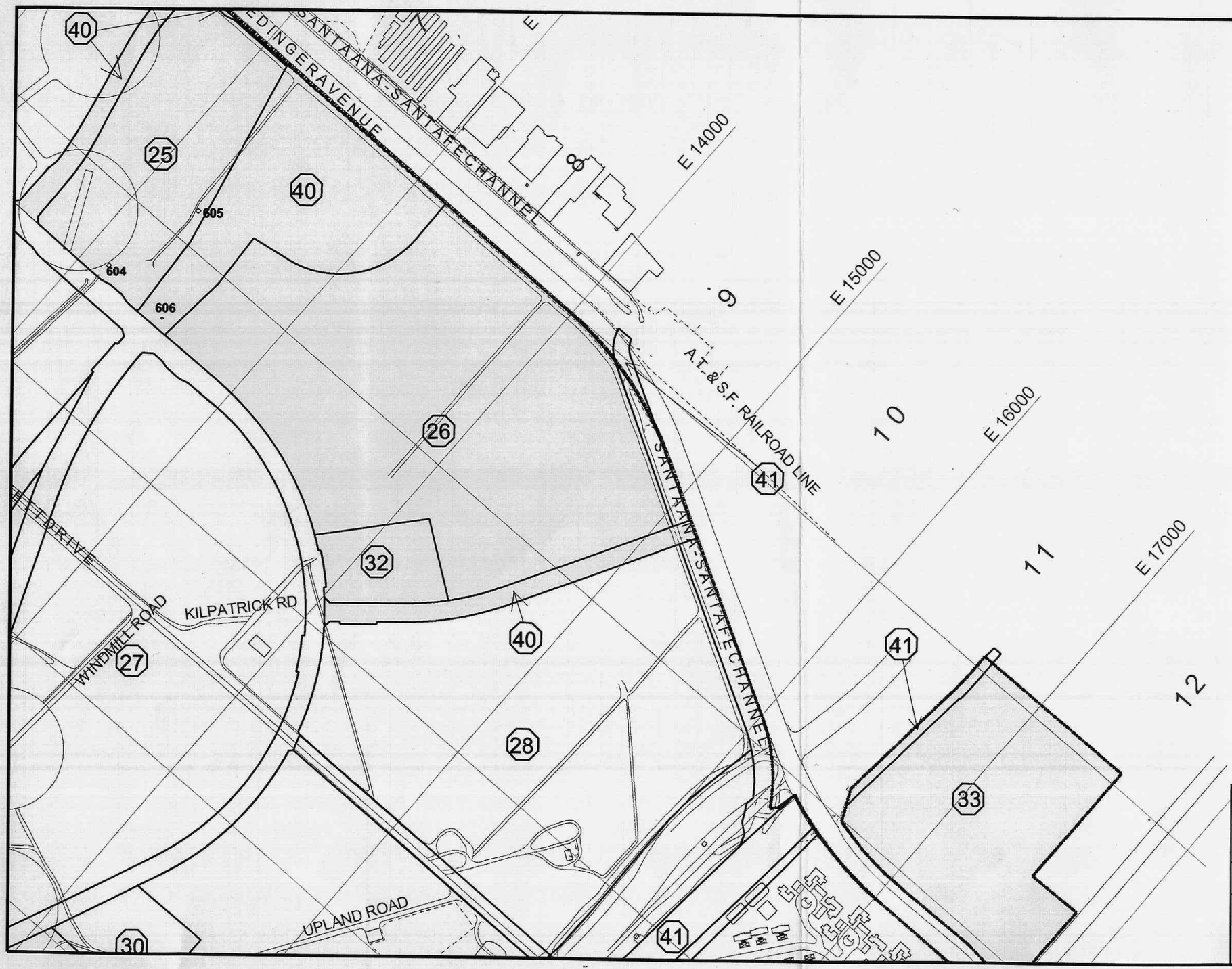
Figure 3

Buildings and Structures Within Transfer Parcels 4-8, 10-12, 14, 40, 41 and 42, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/31/01
File No.: 187L7696
Job No.: 22214-187
Rev No.: A



LEGEND

- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES

NOTE:

ALL LOCATIONS ARE APPROXIMATE.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

500 0 500 Feet

Finding of Suitability to Transfer

Figure 4

Buildings and Structures Within Transfer Parcels 25, 26, 32, 33, 40 and 41, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/31/01
File No.: 187L7697
Job No.: 22214-187
Rev No.: A

LEGEND

- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN THE TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)

NOTE:

ALL LOCATIONS ARE APPROXIMATE.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

500 0 500 Feet

Finding of Suitability to Transfer

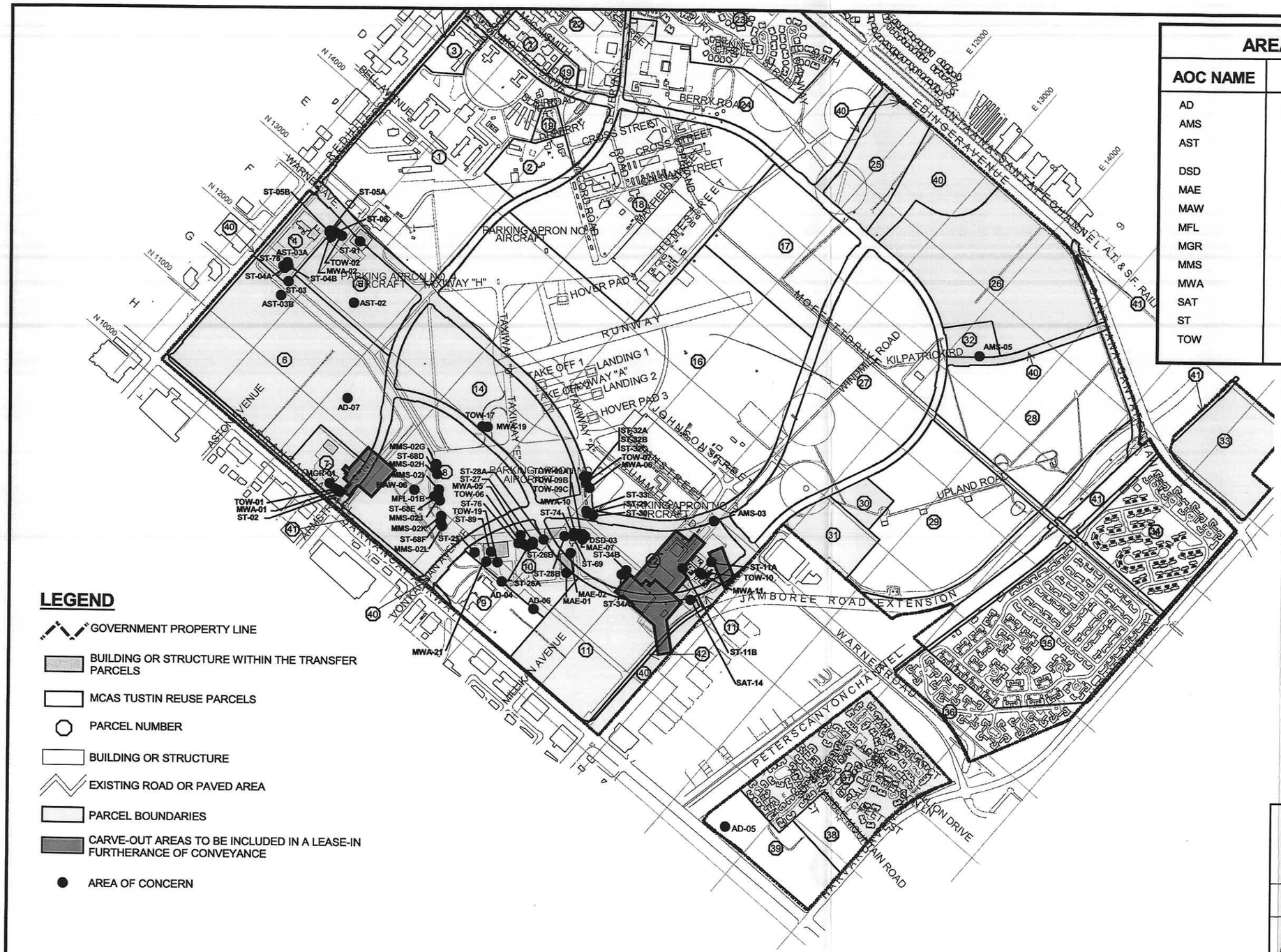
Figure 5

Buildings and Structures Within Transfer Parcels 30, 31, 37, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/31/01
File No.: 187L7698
Job No.: 22214-187
Rev No.: A



AREAS OF CONCERN

AOC NAME	AOC DESCRIPTION
AD	AIR PHOTO, POSSIBLE DISPOSAL AREA
AMS	AIR PHOTO, MISCELLANEOUS, POSSIBLE SPILL AREA
AST	AIR PHOTO, MISCELLANEOUS, POSSIBLE ABOVEGROUND STORAGE TANK
DSD	DISPOSAL, STORM DRAIN
MAE	MISCELLANEOUS, AIR EMISSION
MAW	MISCELLANEOUS, ABANDONED WELL
MFL	MISCELLANEOUS, FUEL LINE
MGR	MISCELLANEOUS, GREASE RACK
MMS	MISCELLANEOUS, MAJOR SPILL
MWA	MISCELLANEOUS, WASH AREA
SAT	STORAGE, ABOVEGROUND TANK
ST	STORAGE, TEMPORARY
TOW	TREATMENT, OIL WATER SEPARATOR

NOTES:

1. ALL LOCATIONS ARE APPROXIMATE.
2. ALL AOCS HAVE RECEIVED REGULATORY CONCURRENCE FOR NO FURTHER ACTION.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

LEGEND

- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN THE TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE
- AREA OF CONCERN

N

1200 0 1200 Feet

Finding of Suitability to Transfer

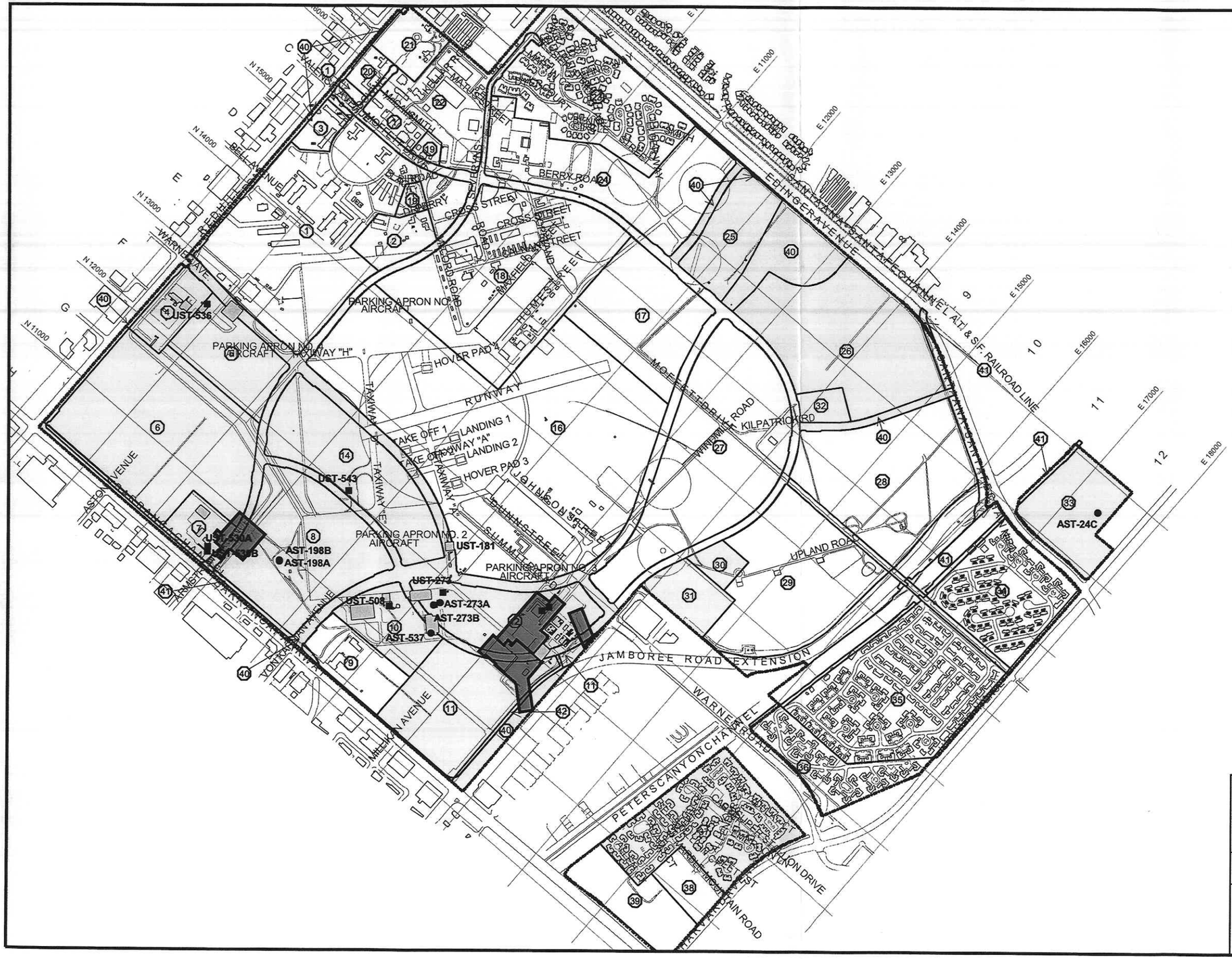
Figure 6

Former AOCs Within Transfer Parcels 4-8, 10-12, 14, 25, 30-33, 37, 40, 41 and 42, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 9/14/01
File No.: 187L7699
Job No.: 22214-187
Rev No.: A



LEGEND

- UNDERGROUND STORAGE TANK
- ABOVEGROUND STORAGE TANK
- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)

NOTES:

1. ALL LOCATIONS ARE APPROXIMATE.
2. ALL ASTS AND USTS HAVE RECEIVED REGULATORY CONCURRENCE FOR NO FURTHER ACTION.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

1200 0 1200 Feet

Finding of Suitability to Transfer

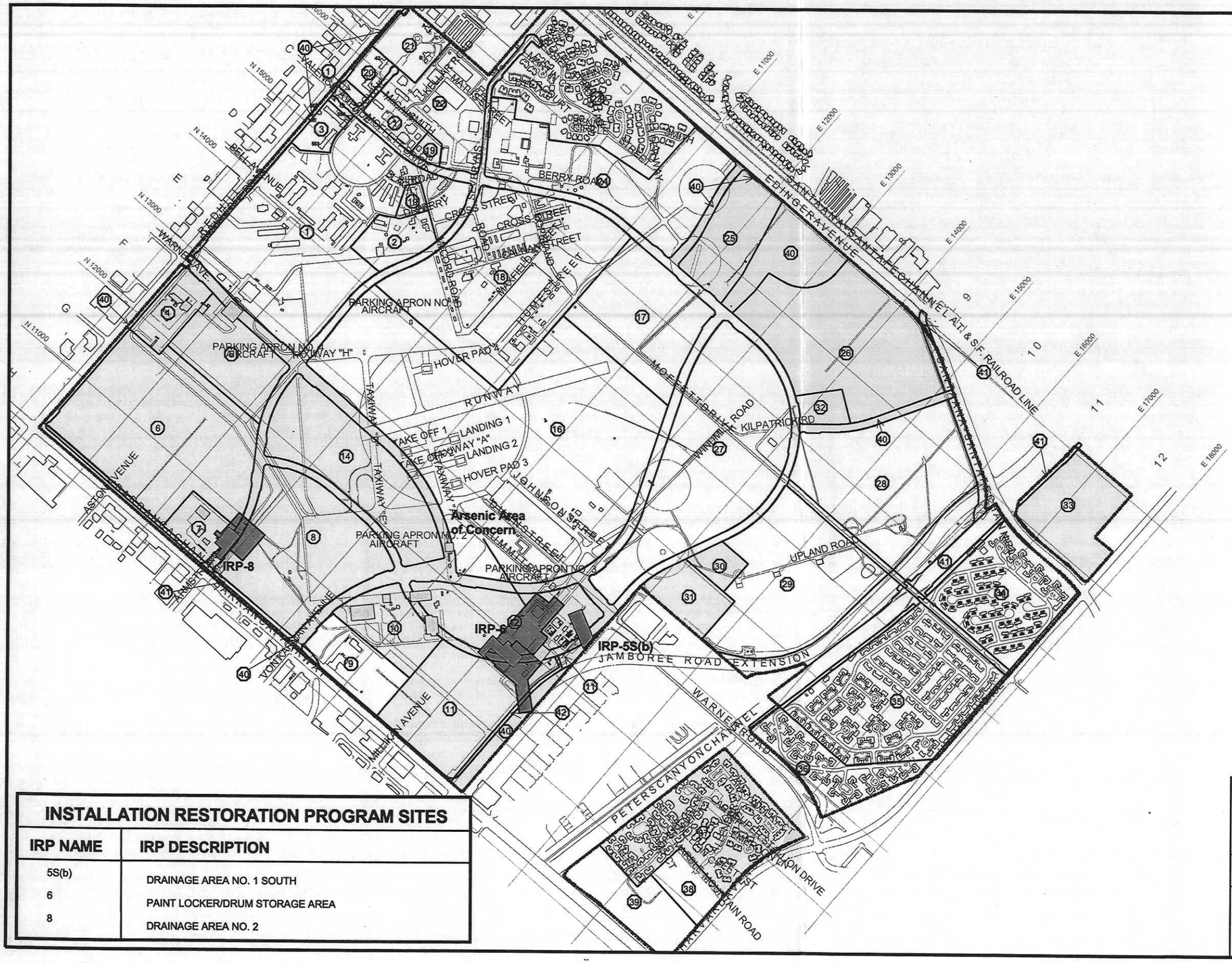
Figure 7

Former USTs and ASTs Within Transfer Parcels 4-8, 10-12, 14, 25, 26, 30-33, 37, 40, 41 and 42, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 9/14/01
File No.: 187L7700
Job No.: 22214-187
Rev No.: A



INSTALLATION RESTORATION PROGRAM SITES

IRP NAME	IRP DESCRIPTION
5S(b)	DRAINAGE AREA NO. 1 SOUTH
6	PAINT LOCKER/DRUM STORAGE AREA
8	DRAINAGE AREA NO. 2

LEGEND

- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)
- IRP SITES WITHIN CARVE-OUT AREAS

NOTE:

1. ALL LOCATIONS ARE APPROXIMATE.

SOURCES:

IRP LOCATIONS BASED ON: FINAL REMEDIATION REPORT FOR OU-1 AND OU-2, MCAS TUSTIN, CALIFORNIA, BNI, NOVEMBER 1997; FINAL EXPANDED SITE INSPECTION REPORT, MCAS TUSTIN, CALIFORNIA, BNI, MARCH 1997; AND FINAL RCRA FACILITY ASSESSMENT REPORT, MCAS TUSTIN, BNI, JUNE 1997.

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

N

1200 0 1200 Feet

Finding of Suitability to Transfer

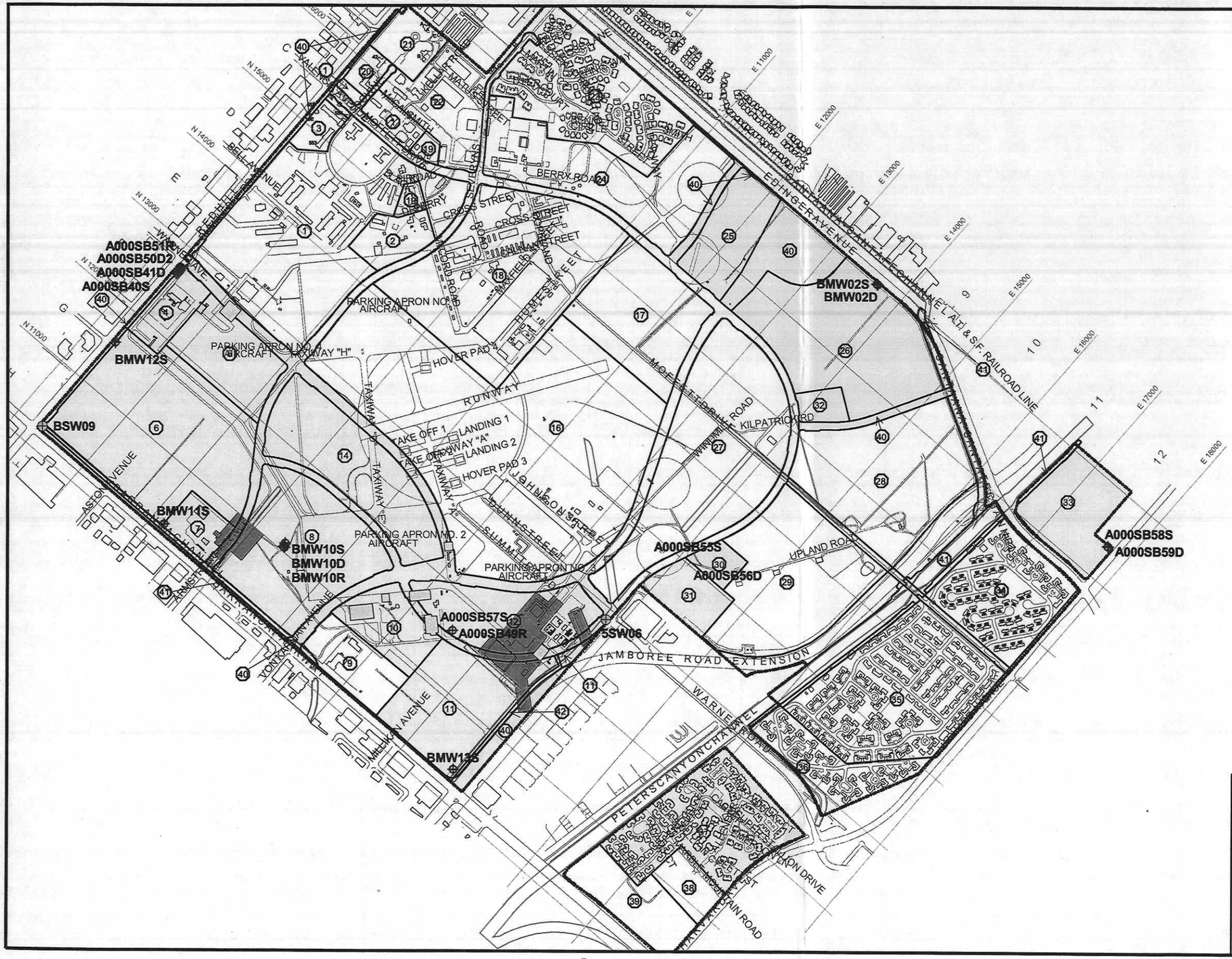
Figure 8

Installation Restoration Program (IRP) Sites 5S(b), 6 and 8, and Arsenic Area of Concern (AOC), FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/31/01
File No.: 187L7701
Job No.: 22214-187
Rev No.: A



LEGEND

- MONITORING WELL
- SURFACE WATER GAUGING LOCATION
- GOVERNMENT PROPERTY LINE
- BUILDING OR STRUCTURE WITHIN THE TRANSFER PARCELS
- MCAS TUSTIN REUSE PARCELS
- PARCEL NUMBER
- BUILDING OR STRUCTURE
- DRAINAGE DITCH
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- CARVE-OUT AREAS TO BE INCLUDED IN A LEASE-IN FURTHERANCE OF CONVEYANCE (LIFOC)

N

NOTES:

1. ALL LOCATIONS ARE APPROXIMATE.
2. SURFACE WATER GAUGING LOCATIONS CONSIST OF PERMANENT MONUMENTS FOR MEASURING SURFACE WATER ELEVATION.
3. MONITORING WELLS BMW11S, BMW12S, A000SB57S, A000SB49R, A000SB55S, A000SD58S, AND A000SB59D WILL BE DECOMMISSIONED BEFORE PROPERTY TRANSFER.

SOURCES:

PARCEL DESIGNATION AND FUTURE LAND REUSE ARE BASED ON MCAS TUSTIN SPECIFIC PLAN/REUSE PLAN, ERRATA (CITY OF TUSTIN 1998).

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21,1990. REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

1200 0 1200 Feet

Finding of Suitability to Transfer

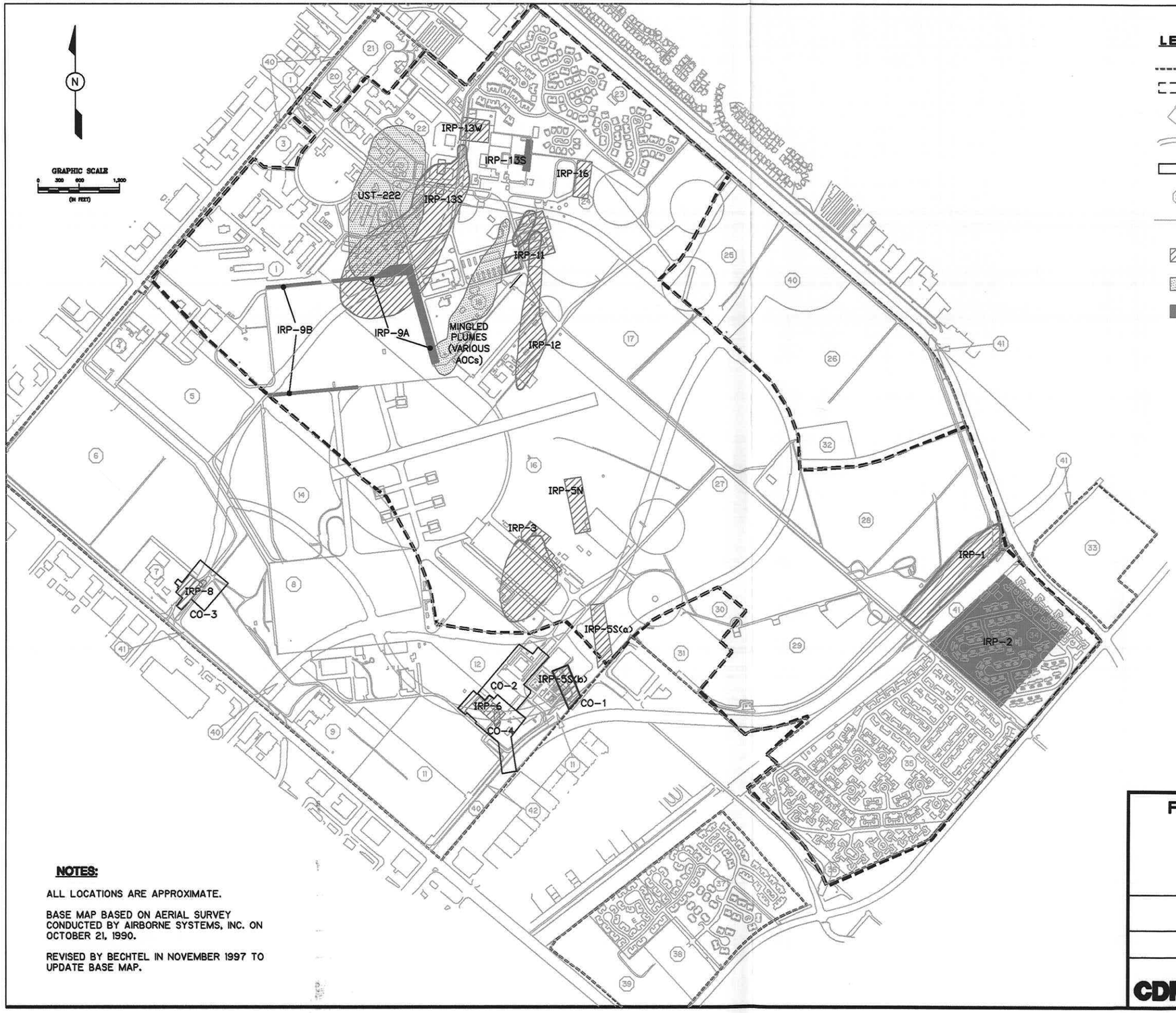
Figure 9

Monitoring Well and Surface Water Gauging Locations Within Parcels 4-8, 10-12, 14, 25, 26, 30-33, 37, 40, 41, and 42, FOST 2

Marine Corps Air Station, Tustin, California

Bechtel National, Inc.
CLEAN II Program

Date: 8/30/01
File No.: 187L7702
Job No.: 22214-187
Rev No.: A



LEGEND

- GOVERNMENT PROPERTY LINE
- FOST BOUNDARIES
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- CARVE-OUT AREAS
- (20) PARCEL NUMBER
- PARCEL BOUNDARIES
- IRP SITES
- NON-IRP SITES
- NFA SITES

NOTES:

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

ACRONYMS

AOC - area of concern
CO - Carve-Out area
FOST - Finding of Suitability to Transfer
FOSL - Finding of Suitability to Lease
IRP - Installation Restoration Program
NFA - no further action

FINDING OF SUITABILITY TO TRANSFER

Figure 10

CONTAMINATION PLUME BASE MAP

Marine Corps Air Station Tustin
Tustin, California

Date: 09/01

File No.: 010_10

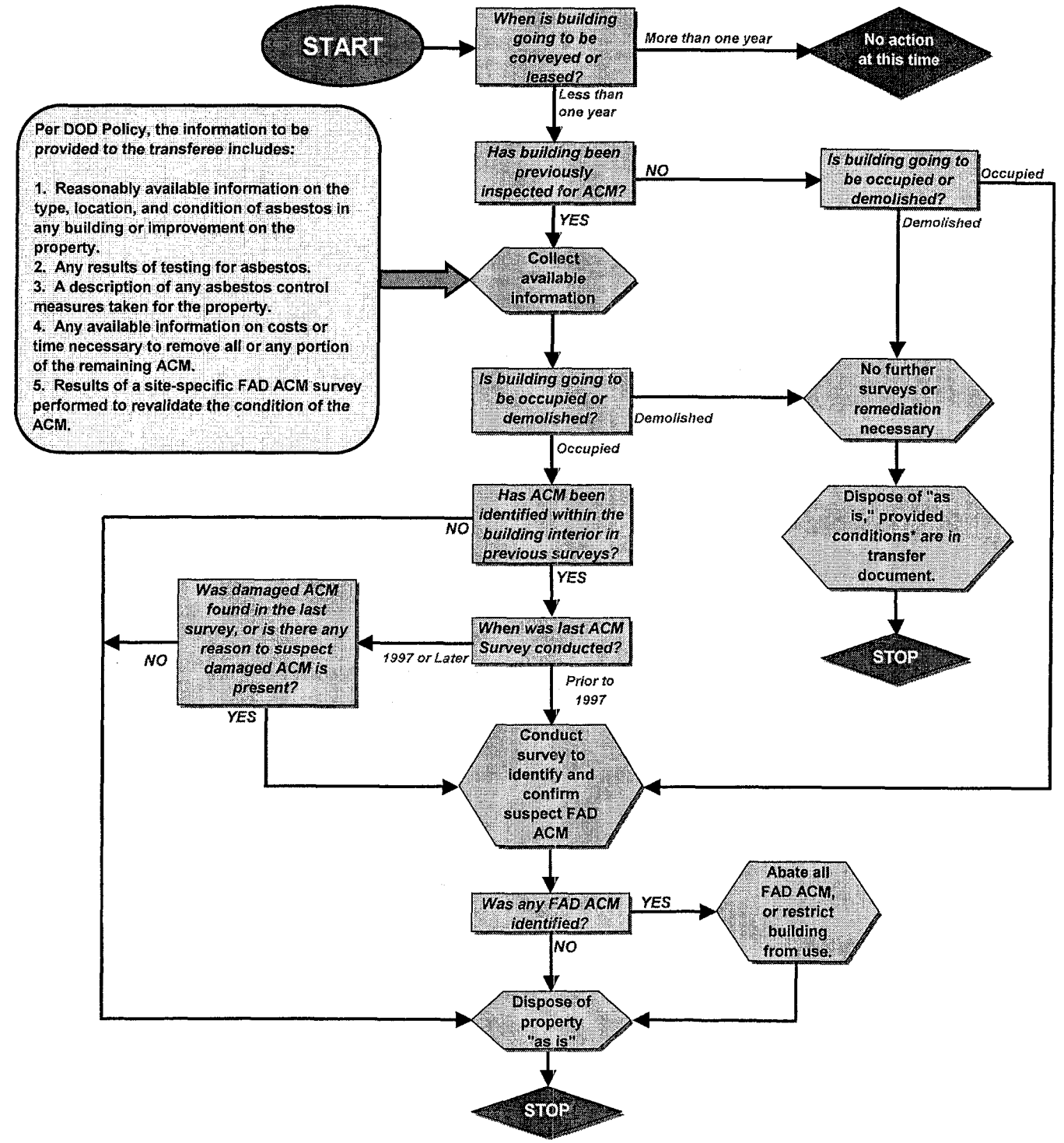
CDM Federal Programs Corporation

DO No.: 1801-010 fost12

FIGURE 11
DECISION TREE FOR ASBESTOS-CONTAINING MATERIAL SURVEYS

DOD POLICY ON ASBESTOS AT BRAC PROPERTIES

Prior to property disposal, all available information on the existence, extent and condition of ACM shall be provided to the transferee in an EBS report or other appropriate document. All property containing ACM will be conveyed, leased or otherwise disposed of as is through the BRAC process, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer. This flow chart summarizes the steps necessary to comply with the DOD policy on asbestos at BRAC properties.



* Unless existing surveys indicate that there is no ACM which poses a threat to human health, the transfer document must prohibit occupation of the buildings prior to the demolition, and the transferee must assume responsibility for the management of any ACM in accordance with applicable laws.

ATTACHMENT 1

REFERENCES

REFERENCES

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DON. *See* United States Department of Navy.

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PWC. *See* Navy Public Works Center.

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ATTACHMENT 2

NO FURTHER ACTION
REGULATORY CONCURRENCE LETTERS FOR
AOCs, USTs, AND ASTs, PARCELS 4–8, 10–12, 14, PORTIONS OF 40 AND 41, AND 42

CONCURRENCE SIGNATURE PAGE

CONCURRENCE TO REMOVE AREAS OF CONCERN (AOCs) MAW-01, MAW-02, MAW-03, MAW-04, MAW-05, AND MAW-06 FROM THE MCAS TUSTIN AOC LIST AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation to remove areas of concern (AOCs) MAW-01, MAW-02, MAW-03, MAW-04, MAW-05, and MAW-06 from the MCAS Tustin AOC List at MCAS Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 7/12/2001

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 7/12/01

Patricia Hannon,
RWQCB
Project Manager

Date: 7/12/2001

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 7/12/01

California Regional Water Quality Control Board
Santa Ana Region

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov/rwqcb8.

May 3, 2001

Mr. Keith Forman, 06CC.KF
BRAC Environmental Coordinator
Southwest Division Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

DETERMINATION OF NO FURTHER ACTION, ABOVEGROUND STORAGE TANKS 198 A/B (FORMER IRP SITE 7 – SOUTH), FORMER MARINE CORPS AIR FACILITY, TUSTIN

Dear Mr. Forman:

We have reviewed the documents entitled Draft Addendum to Tank Removal and Site Closure Report, Aboveground Storage Tanks 198 A/B, dated March 23, 2001 and Tank Removal and Site Closure Report, Aboveground Storage Tanks 198 A/B, dated January 29, 1999 (prepared by OHM Remediation Services Corp.).

This site was a former helicopter rapid refueling area located adjacent to an aircraft parking apron. The fueling system was comprised of aboveground storage tanks, pumps, and piping. The fuel impacted soils were found at depths ranging from three to twelve feet below ground surface and JP-5 was reported to be floating on the groundwater table.

Two 30,000-gallon aboveground storage tanks and associated piping were removed in April 1998. The remedy selected for the site was soil removal and on-site treatment by thermal desorption. Approximately 93,000 tons of total petroleum hydrocarbon (TPH) impacted soils with concentrations exceeding 1,000 mg/kg were removed and treated from July 1996 through May 1998, in three stages. Confirmation samples were analyzed by U.S. EPA Standard Methods 8015 modified and 8020. Confirmation sampling from the floor and side walls of the excavation were continuously collected for compliance with the cleanup goal of 1,000 mg/kg TPH. Groundwater that accumulated in the excavation was pumped into a temporary storage tank. The water was treated by granular activated carbon filtration to concentrations below the limits specified in the Regional Board's General Groundwater Cleanup Permit, Order No. 96-18. The treated water was discharged into a nearby storm drain. Verification groundwater samples from 18 temporary well points were analyzed and results were non-detect for all volatile organic compounds (including benzene, toluene, ethylbenzene, and xylenes) and TPH was detected at concentrations ranging from non-detect to 270 mg/l. Five areas of TPH contaminated soil, above the target cleanup level, were left in place because of their proximity to utilities and structures necessary for operation of the air station.

In January 1999, the Navy submitted a Tank Removal and Site Closure Report. Subsequent to the submittal of the closure report and the Regional Board staff's response, the air station

discontinued air operations and was closed as an active military installation. Therefore, on July 25, 2000, the Regional Board staff responded to the closure report requesting that the three areas of known TPH contamination be remediated.

The Navy responded by reopening the soil removal remedial action from September 2000 through February 2001, using the same soil and water treatment methodologies that were previously used. An additional 29,000 tons of TPH impacted soil were removed, and were either treated on-site by thermal desorption or disposed of at an approved, off-site location. An area of 1,2,3-trichloropropane (TCP) and TPH contaminated soil was discovered under the parking apron during excavation activities. Due to the presence of TCP, approximately 200 tons of soil were disposed of off-site. In all five areas of extensive excavation, the floor and side wall sampling demonstrated that all soil with TPH impacts above the cleanup goal had been removed.

Based on the soil and groundwater confirmation samples, it appears that this site does not pose a threat to the beneficial uses of the Irvine Pressure Groundwater Subbasin. Therefore, no further action is necessary for the protection of groundwater quality. This no further action determination is based on available information, with the provision that the information submitted to Regional Board was accurate and representative of site conditions.

If you have any questions regarding this letter, please contact Patricia Hannon at (909) 782-4498.

Sincerely,

Gerard J. Thibeault
Executive Officer

cc: Mr. Nicole Moutoux, U.S. Environmental Protection Agency, Region IX
Ms. Jennifer Rich, Department of Toxic Substances Control, OMF
Ms. DeAnna Dunbar, Naval Facilities Engineering Command, SW DIV

JCS: tus-act188

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN
MAE-07 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) MAE-07 at MCAS Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 3/29/01

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 3/29/01

John Broderick,
RWQCB
Project Manager

Date: 3/29/01

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 3-29-01

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-35, ST-36, ST-51, ST-72A, ST-88, ST-89, ST-90, AND ST-91 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-35, ST-36, ST-51, ST-72A, ST-88, ST-89, ST-90, and ST-91 at MCAS Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 2/22/01

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 2/22/01

John Broderick,
RWQCB
Project Manager

Date: 2/22/01

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 2/22/01

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MWA-10, TOW-09A, TOW-09B, TOW-09C, UST-273, DSD-03, MWA-19, TOW-17, UST-543, MAE-01, MAE-02, MAE-03, TOW-19, AND MGR-01 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-10, TOW-09A, TOW-09B, TOW-09C, UST-273, DSD-03, MWA-19, TOW-17, UST-543, MAE-01, MAE-02, MAE-03, TOW-19, and MGR-01 at MCAS Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 2/22/01

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 2/22/01

John Broderick,
RWQCB
Project Manager

Date: 2/22/01

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 2/22/01

California Regional Water Quality Control Board
Santa Ana Region

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis
Governor

January 17, 2001

Mr. Keith Forman, 06CC.KF
BRAC Environmental Coordinator
Naval Facilities Engineering Command, SWDIV
1220 Pacific Highway
San Diego, CA 92132-5190

COMMENTS ON ABOVEGROUND STORAGE TANK REMOVAL REPORT, ABOVEGROUND STORAGE TANK SITES 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, AND 568, REVISION 1, FORMER MARINE CORPS AIR FACILITY, TUSTIN

Dear Mr. Forman:

We have completed our review of the above referenced document dated December 7, 2000, and received at this office on December 8, 2000. We concur with the recommendation for no further action, with the provision that a correction page for Section 2.5 be submitted for Regional Board staff review and approval. The correction page must include the specific phrasing as written in response to our comment 5e.

For any questions on this review or related matters, please call me at (909) 782-4494.

Sincerely,

John Broderick
SLIC/DoD/AGT Section

cc: Ms. Jennifer Rich, Department of Toxic Substances Control, OMF
Ms. DeAnna Dunbar, Naval Facility Engineering Command, SWDIV
Ms. Nicole Moutoux, U.S. EPA, Region IX

MCAS Tustin - Upcoming Documents for Review / Being Reviewed - As of 04/26/01

DOCUMENT NAME	APPROXIMATE DATE BCT RECEIVES (FFSRA DATES SHOWN IN BOLD ITALICS)	EXPECTED BCT REVIEW TIME(DAYS) AND DATE	COMMENTS
ms Completed/Deleted from last meeting:			
n ST RCRA Sites Closure Report - Group 11 - MAE-07 (FINAL)	29-Mar-01	NA	Signed at 3/29/01 BCT meeting
ork Plan Addendum for 2001 Groundwater Sampling	13-Apr-01	NA	Provided for records.
storical Radiological Assessment (FINAL)	9-Apr-01	NA	
ST Closure Report 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, and 568 INAL)	17-Jan-01	NA	At 3/29 BCT meeting, RWQCB concurred with NFA.
on ST RCRA Sites Closure Report - Group 10 - MWA-15, UST-89 (FINAL)	11-Apr-01	NA	TOW-X4 moved into CERCLA (OU-1B). NFA at 3/29 BCT meeting.
WA-18 Tech Memo (FINAL)	5-Mar-01	NA	

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MAW-07, MAW-08, MAW-16, TOW-03, UST-526A, UST-526B, AND TOW-07 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MAW-07, MAW-08, MAW-16, TOW-03, UST-526A, UST-526B, and TOW-07 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 11/16/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 11/16/00

John Broderick,
RWQCB
Project Manager

Date: 11/16/00

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 11-16-00

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN TOW-01
AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) TOW-01 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 11/16/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 11/16/00

John Broderick,
RWQCB
Project Manager

Date: 11/16/00

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 11-16-00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 28. 2000

Mr. Keith Forman, 06CC.KF
BRAC Environmental Coordinator
Marine Corps Air Facility Tustin
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Re: Record of Decision, OU-2, No Action Sites and Areas of Concern, Marine Corps Air Facility, Tustin, September, 2000

Dear Mr. Forman:

The United States Environmental Protection Agency, Region IX (USEPA) has received and reviewed the Record of Decision for OU-2, No Action Sites and Areas of Concern for the Tustin Marine Corps Air Facility, September. 2000. The Record of Decision (ROD) addresses a number of sites and areas of concern where no remedial action is required to protect human health and the environment.

Since the Marine Corps Air Facility Tustin is not on the National Priorities List, USEPA does not have a formal concurrence role and will not be signing the ROD. However, the USEPA has been an active participant on the team overseeing the environmental investigation, testing and evaluation in support of the remedial work at these sites. The Department of the Navy (DON) has worked in cooperation with the State of California Department of Toxic Substances Control and the Santa Ana Regional Water Quality Control Board as well as with the USEPA in the development of alternatives as well as remedy selection for these sites. We therefore find the ROD sufficient to meet our requirements and are in agreement with the selected remedy for these IR sites.

We wish to thank the Navy for the opportunity to be involved in the work at the Marine Corps Air Facility Tustin. We look forward to working with the Navy and regulatory agencies in the future to insure a thorough cleanup and safe transfer of all DON property comprising the facility.

Sincerely,

Daniel A Meer, Chief
Federal Facilities Branch

Date: 03/14/00

Declaration

Signature: _____ Date: 9/21/00

Mr. Keith Forman
Base Realignment and Closure Environmental Coordinator
Marine Corps Air Facility Tustin

Signature: _____ Date: 9/26/00

Mr. John E. Scandura, Chief
Southern California Operations
Office of Military Facilities
Department of Toxic Substances Control

Signature: _____ Date: 9/29/00

Mr. Gerard Thibeault
Executive Officer
Regional Water Quality Control Board, Santa Ana Region

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, AND AS-3C AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, and AS-3C at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 6/22/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 6/22/00

Patricia Hannon,
RWQCB
Project Manager

Date: 6/22/00

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 6/22/00

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, AND MWA-21 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, and MWA-21 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 5/18/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 5/18/00

Patricia Hannon,
RWQCB
Project Manager

Date: 5/18/00

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 5/18/00

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, AND ST-45 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 5/18/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 5/18/00

Patricia Hannon,
RWQCB
Project Manager

Date: 5/18/00

Jennifer Rich,
Cal-EPA, DTSC
Project Manager

Date: 5/18/00

California Regional Water Quality Control Board
Santa Ana Region

Winston H. Hickox
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Gr
G

May 15, 2000

Mr. Keith Forman, 06CC.KF
BRAC Environmental Coordinator
Naval Facilities Engineering Command, SWDIV
1220 Pacific Hwy
San Diego CA 92132-5190

ABOVEGROUND STORAGE TANK REMOVAL REPORT FOR ABOVEGROUND STORAGE TANK (AST) SITES 27, 28 (28A), 186, 227, 537, 540A, 540B, AND 6169B, MARINE CORPS AIR FACILITY, TUSTIN

Dear Mr. Forman:

We have completed our review of the above referenced document dated June 9, 1998 and received at this office on July 23, 1998. According to the report, eight ASTs were inspected for leaks and soil samples were collected for analysis, if evidence of leakage (visable surface staining) was found. Please note that AST 28 in the title of the above report is referred to as AST 28A in the text and on the maps. No surface staining was observed around ASTs 27, 28A, 227, 537, 540A, 540B, and 6169B.

At AST168 staining was observed near the tank. Two soil samples were collected: one at the surface and one at one foot below the surface. The soil samples were analyzed for total petroleum hydrocarbons (TPH) as diesel and volatile organic compounds. The laboratory analytical results showed low concentrations of TPH in the surface sample and low concentrations of 2-butanone and acetone in the deeper sample.

Base on the information in the June 9, 1998 <u>Aboveground Storage Tank Removal Report for Aboveground Storage Tank (Ast) Sites 27, 28, 186, 227, 537, 540A, 540B, And 6169B, Marine Corp Air Facility, Tustin,</u> and provided it is accurate and representative of the site conditions, we concur with your request for no further action at the following AST sites 27, 28A, 186, 227, 537, 540A, 540B, And 6169B.

If you should have any questions, please call me at (909) 782-4498.

Sincerely,

Patricia A. Hannon

Patricia A. Hannon
SLIC/DoD/AGT Section

cc: Dept. of Toxic Substances Control - Sharon Fair
Naval Facility Engineering Command, SWDIV - DeAnna Dunbar
Orange County Health Care Agency - Quang Tran
U. S. EPA - Nicole Moutoux

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, AND ST-80 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 4/21/00

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 4/21/2000

Patricia Hannon,
RWQCB
Project Manager

Date: 4/21/2000

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 4/21/2000

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MWA-05, TOW-06, UST-508, MWA-12, TOW-11, UST-251, MWA-13, TOW-12, AND UST-252 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-05, TOW-06, UST-508, MWA-12, TOW-11, UST-251, MWA-13, TOW-12, and UST-252 at MCAF Tustin, California.

Keith Forman
BRAC Environmental Coordinator
Date: 3/9/00

Nicole Moutoux,
U.S. EPA
Project Manager
Date: 3/9/00

Patricia Hannon,
RWQCB
Project Manager
Date: 3/9/00

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager
Date: 3/9/2000

STATE OF CALIFORNIA – RESOURCES AGENCY GRAY DAVIS

CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION
Office of the State Fire Marshal
Pipeline Safety Program
5821 Paramount Blvd. Suite 210
Lakewood, California 90712

(562) 497-9100
FAX (562) 497-9104

MFL-1

December 21, 1999

Chris Johnson, OHM Site Superintendent
IT Group
3347 Michelson Drive, Suite 200
Irvine, California 92712

SUBJECT: Closure report on MCAF Tustin Pipelines
SFM#653

We have received your letter of October 18, 1999 requesting confirmation of pipeline closure activities at MCAF Tustin. The 4" on base JP-5 pipeline and the 6" offbase JP-5 pipelines (SFM#653) were both purged and closed per our requirements and are classified as "Out of Service."

ROBERT GORHAM,
Supervising Pipeline Safety Engineer

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 12/7/99

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 12/8/99

Patricia Hannon,
RWQCB
Project Manager

Date: 12/9/99

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 12/9/1999

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 10/14/99

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 10/14/99

Patricia Hannon,
RWQCB
Project Manager

Date: Oct 14 1999

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 10/14/1999

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, AND ST-78 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 9/24/99

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 9/24/99

Patricia Hannon,
RWQCB
Project Manager

Date: 9/24/99

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 9/24/99

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-1A, ST-1B, ST-2, ST-6, ST-32A, ST-32B, ST-32C, AND ST-77 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-1A, ST-1B, ST-2, ST-6, ST-32A, ST-32B, ST-32C, and ST-77 at MCAF Tustin, California.

Keith Forman,
BRAC Environmental Coordinator

Date: 9/24/99

Nicole Moutoux,
U.S. EPA
Project Manager

Date: 9/24/99

Patricia Hannon,
RWQCB
Project Manager

Date: 9/24/99

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 9/24/99

COUNTY OF ORANGE
HEALTH CARE AGENCY

PUBLIC HEALTH
DIVISION OF ENVIRONMENTAL HEALTH

TOM URAM
DIRECTOR

[illegible]

TELEPHONE: (714) 667-[illegible]
FAX: (714) [illegible]

March 13, 1998

LT. Hope Katcharian
Director, Environmental Engineering Division
Commanding General
AC/S Environmental 1AU
Marine Corps Air Station El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

Subject: Completion of Tank Removal Project

RE: Marine Corps Air Facility Tustin
Tank #530A
Santa Ana, CA 92710

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on September 13, 1997, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Dickmann, M.S., REHS
Supervising Hazardous Waste Specialist
Hazardous Materials Management Section
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board

STATE OF CALIFORNIA—CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, Gov
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION
737 MAIN STREET, SUITE 500
RIVERSIDE, CA 92501-3339
PHONE: (909) 782-4130
FAX: (909) 781-6288

January 21, 1998

Mr. Wayne D. Lee
Assistant Chief of Staff
Environment and Safety
Marine Corps Air Station El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

SITE ASSESSMENT/CLOSURE LETTER REPORT, UST SITE 181, MARINE CORPS AIR FACILITY TUSTIN

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for UST Site 181 MCAF Tustin. Based on the information provided in the Site Assessment/Closure Letter Report UST Site 181, Marine Corps Air Station Tustin dated 1/2/98 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the UST release site 181 is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations.

If you have any questions regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

Gerard J. Thibeault
Executive Officer

cc: LT. Hope Katcharian, Marine Corps Air Station El Toro
Mr. Bill Diekman, Orange County Health Care Agency
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean Water Programs

STATE OF CALIFORNIA—CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
PETE WILSON, Governor
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION
3737 MAIN STREET, SUITE 500
RIVERSIDE, CA 92501-3339
PHONE: (909) 782-4130
FAX: (909) 781-6288

November 26, 1997

Mr. Wayne D. Lee
Assistant Chief of Staff
Environment and Safety
Marine Corps Air Station El Toro
P.O. Box 95001
Santa Ana, CA 92709-5001

CASE CLOSURE, PARCEL 33 PETROLEUM SITE, MARINE CORPS AIR FACILITY TUSTIN

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for the Parcel 33 Petroleum Site. Based on the information provided in the Site Assessment/Closure Report Parcel 33* dated 8/1/97 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the petroleum release is required.

If you have any questions regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

for Gerard J. Thibeault
Executive Officer

* Includes AST-2AC

cc: Mr. Tayseer Mahmud, DTSC, Office of Military Facilities, Region 4
LT. Hope Katcharian, Marine Corps Air Station El Toro
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean Water Programs

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10; AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendations for no further action for areas of concern (AOCs) AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 at MCAS Tustin, California.

Desire Chandler
Desire Chandler,
BRAC Environmental Coordinator

Date: 7/24/97

Nicole Moutoux
Nicole Moutoux,
U.S. EPA
Project Manager

Date: 7/24/97

Larry Vitale
Larry Vitale,
RWQCB
Project Manager

Date: 7/24/97

Majed Ibrahim
Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

Date: 7/23/97

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN ST-03 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) ST-03 at MCAS Tustin, California.

Desire Chandler — Date: 7/24/97
Desire Chandler,
BRAC Environmental Coordinator

Nicole Moutoux — Date: 7/24/97
Nicole Moutoux,
U.S. EPA
Project Manager

Larry Vitale — Date: 7/24/97
Larry Vitale,
RWQCB
Project Manager

Majed Ibrahim — Date: 7/24/97
Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

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CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN AD-07 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) AD-07 at MCAS Tustin, California

Desire L Chandler
Desire Chandler,
BRAC Environmental Coordinator

Date: April 7, 1997

Nicole Moutoux
Nicole Moutoux,
U.S. EPA
Project Manager

Date: April 9, 1997

Larry Vitale
Larry Vitale,
RWQCB
Project Manager

Date: April 9, 1997

Majed Ibrahim
Majed Ibrahim
Cal-EPA, DTSC
Project Manager

Date: 4/19/1997

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CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN AST-03b AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendations for No Further Action for the area of concern (AOC) AST-03b at MCAS Tustin, California

Desire Chandler

DESIRE CHANDLER,
BRAC Environmental Coordinator

Date: 10/22/96

David Hodges

DAVID HODGES,
U.S. EPA
Project Manager

Date: 10/22/96

Larry Vitale

LARRY VITALE,
RWQCB
Project Manager

Date: 10/22/96

Majed Ibrahim

MAJED IBRAHIM,
Cal-EPA, DTSC
Project Manager

Date: 10/22/96

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73 and MAE-04A, ST-74, TOW-X5, and TOW-16, AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendations for No Further Action for areas of concern (AOCs) AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73 and MAE-04A, ST-74, TOW-X5, and TOW-16 at MCAS Tustin, California:

Desire Chandler

DESIRE CHANDLER,
BRAC Environmental Coordinator

Date: 9/16/96

David Hodges

DAVID HODGES,
U.S. EPA
Project Manager

Date: 9/16/96

Larry Vitale

LARRY VITALE,
RWQCB
Project Manager

Date: 9/16/96

MAJED IBRAHIM
Cal-EPA, DTSC
Project Manager

Date: 9/16/96

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 AT MCAS TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendations for no further action for areas of concern (AOCs) AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 at MCAS Tustin, California

Desire Chandler,
BRAC Environmental Coordinator

date: 22 April 96

David Hodges,
U.S. EPA
Project Manager

date: 4/22/96

Larry Vitale,
RWQCB
Project Manager

date: 4/22/96

Majed Ibrahim
Cal-EPA, DTSC
Project Manager

date: 4/22/96

CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AD-05, AND AD-06 AT MCAS TUSTIN, California

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOCs) AD-05, and AD-06 at MCAS Tustin, California.

Desire Chandler — Date: 20MAR96

Desire Chandler,
BRAC Environmental Coordinator

David Hodges — Date: 3/20/96

David Hodges,
U.S. EPA
Project Manager

Lawrence Vitale — Date: 3/20/96

Larry Vitale,
RWQCB
Project Manager

Majed Ibrahim — Date: 3/20/1996

Majed Ibrahim,
Cal-EPA, DTSC
Project Manager

ATTACHMENT 3

HAZARDOUS SUBSTANCE AND UST/AST SUBSTANCE NOTIFICATION TABLES

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 4	AST-3A	Total Recoverable Petroleum Hydrocarbons	NA	NA	NA	NA	NA	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-62
Parcel 4	ST-3	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Mercury	7439976	NA	U151	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	4,4'-DDE	72559	DDE	NA	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Toluene	108883	Methylbenzene	U220	1,000	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Trichloroethene	79016	Trichloroethylene	U228	1,000	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Trichlorofluoromethane	75694	Trichloromonofluoromethane	U121	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Xylenes	1330207	Dimethylbenzene	U239	1,000	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Bis(2-ethylhexyl)phthalate	117817	Diethylhexyl phthalate, [bis(2-ethylhexyl)] ester, 1,2-benzenedicarboxylic acid,	U028	1	Unknown	???? to 1995	R	D, Table 1
Parcel 4	ST-3	Paints	NA	NA	NA	NA	Unknown	???? to 1995	S	A, Tbl. F-1
Parcel 4	ST-3	Solvents	NA	NA	NA	NA	Unknown	???? to 1995	S	A, Tbl. F-1
Parcel 4	ST-3	Hydraulic fluids	NA	NA	NA	NA	Unknown	???? to 1995	S	A, Tbl. F-1
Parcel 4	ST-3	Lubricants	NA	NA	NA	NA	Unknown	???? to 1995	S	A, Tbl. F-1
Parcel 4	ST-4	Mercury	7439976	NA	U151	1	Unknown	1991 to 1995	R	C, Sec. 5.2 - Att. 1 Tbl. 1-2
Parcel 4	ST-4	Bisphenol A	NA	NA	NA	NA	Unknown	1991 to 1995	R	C, Sec. 5.2 - Att. 1 Tbl. 1-2
Parcel 4	ST-4	Bis(2-ethylhexyl)phthalate	117817	Diethylhexyl phthalate, [bis(2-ethylhexyl)] ester, 1,2-benzenedicarboxylic acid,	U028	1	Unknown	1991 to 1995	R	C, Sec. 5.2 - Att. 1 Tbl. 1-2
Parcel 4	ST-4	Diesel	NA	NA	NA	NA	Unknown	1991 to 1995	R	C, Sec. 5.2 - Att. 2 Tbl. 1-1
Parcel 4	ST-4	Acetone	67641	2-propanone	U002	1	Unknown	1991 to 1995	R	C, Sec. 5.2 - Att. 1 Tbl. 1-2
Parcel 4	ST-4	Toluene	108883	Methylbenzene	U220	1,000	Unknown	1991 to 1995	R	C, Sec. 5.2
Parcel 4	ST-4	Paints	NA	NA	NA	NA	Unknown	1991 to 1995	S	C, Sec. 5.2 - Att. 1
Parcel 4	ST-4	Solvents	NA	NA	NA	NA	Unknown	1991 to 1995	S	C, Sec. 5.2 - Att. 1
Parcel 4	ST-4	Hydraulic fluids	NA	NA	NA	NA	Unknown	1991 to 1995	S	C, Sec. 5.2 - Att. 1
Parcel 4	ST-4	Used oil	NA	NA	NA	NA	Unknown	1991 to 1995	S	C, Sec. 5.2 - Att. 1
Parcel 4	ST-5A	Solvents	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 4	ST-5A	Waste JP-5	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 4	ST-5A	Waste oil	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 4	ST-5A	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	1991 to 1999	NA	H, App. B - File No. ST-05A
Parcel 4	ST-5B	Mercury	7439976	NA	U151	1	Unknown	???? to 1991	R	C, Sec. 5.2 - Att. 3 Tbl. 1-1
Parcel 4	ST-5B	Solvents	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 4	ST-5B	Waste JP-5	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 4	ST-5B	Waste oil	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 4	ST-78	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1992 to 1995	R	A, Tbl. F-1; and C, Sec. 5.2 - Att.21 Tbl. 1-2
Parcel 4	ST-78	Mercury	7439976	NA	U151	1	Unknown	1992 to 1995	R	A, Tbl. F-1; and C, Sec. 5.2 - Att.21 Tbl. 1-2
Parcel 4	ST-78	PCBs and pesticides	NA	NA	NA	NA	Unknown	1992 to 1995	R	A, Tbl. F-1; and C, Sec. 5.2 - Att.21 Tbl. 1-2
Parcel 4	ST-78	Paints	NA	NA	NA	NA	Unknown	1992 to 1995	S	A, Tbl. F-1
Parcel 5	AST-2	Aluminum	NA	NA	NA	NA	Unknown	1947 to 1988	R	A, Tbl. F-1 and C, Tbl. 5-60
Parcel 5	AST-2	Cadmium	7440439	NA	NA	1	Unknown	1947 to 1988	R	A, Tbl. F-1 and C, Tbl. 5-60
Parcel 5	AST-2	Chromium	7440473	NA	NA	1	Unknown	1947 to 1988	R	A, Tbl. F-1 and C, Tbl. 5-60
Parcel 5	AST-2	Molybdenum	7439987	NA	NA	NA	Unknown	1947 to 1988	R	A, Tbl. F-1 and C, Tbl. 5-60
Parcel 5	AST-2	Nickel	7440020	NA	NA	1	Unknown	1947 to 1988	R	A, Tbl. F-1 and C, Tbl. 5-60
Parcel 5	MWA-2	Waste oil	NA	NA	NA	NA	Unknown	1988 to 1999	D	A, Tbl. F-1
Parcel 5	MWA-2	Detergents	NA	NA	NA	NA	Unknown	1988 to 1999	D	H, App. B - File No. MWA-02
Parcel 5	MWA-2	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	1988 to 1999	NA	H, App. B - File No. MWA-02
Parcel 5	ST-6	Paints	NA	NA	NA	NA	Unknown	1991 to 1996	S	H, App. B - File No. ST-6
Parcel 5	ST-6	Solvents	NA	NA	NA	NA	Unknown	1991 to 1996	S	H, App. B - File No. ST-6
Parcel 5	ST-6	Hydraulic fluids	NA	NA	NA	NA	Unknown	1991 to 1996	S	H, App. B - File No. ST-6
Parcel 5	ST-6	Lubricants	NA	NA	NA	NA	Unknown	1991 to 1996	S	H, App. B - File No. ST-6

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 5	ST-6	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1991 to 1996	NA	H, App. B - File No. ST-6
Parcel 5	ST-91	*Helicopter repair area. No hazardous waste reported stored/disposed of. Unit integrity good.*	NA	NA	NA	NA	NA	1988 to 1998	NA	A, Tbl. 5-3
Parcel 5	TOW-2	Waste oil	NA	NA	NA	NA	Unknown	1988 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 5	TOW-2	Fuels	NA	NA	NA	NA	Unknown	1988 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 5	TOW-2	Detergents	NA	NA	NA	NA	Unknown	1988 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 5	TOW-2	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1988 to 1999	NA	H, App. B - File No. TOW-02
Parcel 6	AD-7	*Aerial photo features subsequently identified as navigational aid (TACAN) and associated access road - no contamination*	NA	NA	NA	NA	NA	1965 to 1972	NA	A, Tbl. F-1 and F, Sec. 3.1
Parcel 6	AST-3B	Lead	7439921	NA	NA	1	Unknown	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-63
Parcel 6	AST-3B	Molybdenum	7439987	NA	NA	NA	Unknown	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-63
Parcel 6	AST-3B	Acetone	67641	2-propanone	U002	1	Unknown	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-63
Parcel 6	AST-3B	Toluene	108883	Methylbenzene	U220	1,000	Unknown	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-63
Parcel 6	AST-3B	Phenanthrene	85018	NA	NA	1	Unknown	1965 to 1972	R	A, Tbl. F-1 and C, Tbl. 5-63
Parcel 6	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 7	MGR-1	*PR/VSI indicated grease rack was never used, no evidence of any*	NA	NA	NA	NA	NA	1988 to 1999	NA	F, Sec. 3.2.1
Parcel 7	MWA-1	Diesel	NA	NA	NA	NA	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	Lead	7439921	NA	NA	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	Acetone	67641	2-propanone	U002	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	4,4'-DDD	72548	DDD, TDE, 1,1'(2,2-dichloroethylidene)bis[2-chlorobenzene]	U060	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	4,4'-DDE	72559	DDE	NA	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	alpha-Chlordane	57749	Chlordane, Chlordane (technical mixture and metabolites)	U036	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	Dieldrin	60571	2,7:3,6-dimethanonaphth[2,3-b]oxirene, 3,4,5,6,9,9-hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-, (1aalpha, 2beta, 2aalpha, 3beta, 6beta, 6aalpha, 7beta, 7aalpha)-	P037	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	gamma-Chlordane	57749	Chlordane, Chlordane (technical mixture and metabolites)	U036	1	Unknown	1988 to 1999	R	E, Sec. 5.4 and Tbl. 5-15
Parcel 7	MWA-1	Waste oil	NA	NA	NA	NA	Unknown	1988 to 1999	D	H, App. B - File No. MWA-01
Parcel 7	MWA-1	Solvents	NA	NA	NA	NA	Unknown	1988 to 1999	D	H, App. B - File No. MWA-01
Parcel 7	MWA-1	Detergents	NA	NA	NA	NA	Unknown	1988 to 1999	D	H, App. B - File No. MWA-01
Parcel 7	ST-2	Hydraulic fluids	NA	NA	NA	NA	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	Ethylene glycol	107211	NA	NA	1	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	Grease	NA	NA	NA	NA	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	Waste oil	NA	NA	NA	NA	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	Degreaser	NA	NA	NA	NA	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	Solvents	NA	NA	NA	NA	Unknown	1970 to 1997	S	H, App. B - File No. ST-02
Parcel 7	ST-2	*PR/VSI indicated no visible/reported releases identified.*	NA	NA	NA	NA	NA	1970 to 1997	NA	H, App. B - File No. ST-02
Parcel 7	TOW-1	Waste oil	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. F-1
Parcel 7	TOW-1	Solvents	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. F-1
Parcel 7	TOW-1	Fuels	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 7	TOW-1	Detergents	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. 5-8 and F-1

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 7	TOW-1	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	1987 to 1999	NA	H, App. B - File No. TOW-01
Parcel 7	UST-530B	Mercury	7439976	NA	U151	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20, 5-21
Parcel 7	UST-530B	Acetone	67641	2-propanone	U002	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20 and 5-22
Parcel 7	UST-530B	2,4-dimethylphenol	105679	NA	U101	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20 and 5-22
Parcel 7	UST-530B	Ethylbenzene	100414	NA	NA	1,000	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-22
Parcel 7	UST-530B	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20 and 5-22
Parcel 7	UST-530B	2-methylnaphthalene	NA	NA	NA	NA	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Methyl-tert-butyl ether	1634044	MTBE	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-22 and 5-23
Parcel 7	UST-530B	Xylenes	1330207	Dimethylbenzene	U239	1,000	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-21 and 5-22
Parcel 7	UST-530B	Bis(2-ethylhexyl)phthalate	117817	Diethylhexyl phthalate, [bis(2-ethylhexyl)] ester, 1,2-benzenedicarboxylic acid,	U028	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-23
Parcel 7	UST-530B	Diethyl phthalate	84662	1,2-benzenedicarboxylic acid, diethyl ester	U088	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Fluorene	86737	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Naphthalene	91203	NA	U165	5,000	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20 and 5-21
Parcel 7	UST-530B	Nitrobenzene	98953	NA	U169	1,000	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	N-nitrosodiphenylamine	86306	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Phenanthrene	85018	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	4,4'-DDE	72559	DDE	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	alpha-BHC	319846	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	delta-BHC	319868	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	alpha-Chlordane	57749	Chlordane, Chlordane (technical mixture and metabolites)	U036	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	gamma-Chlordane	57749	Chlordane, Chlordane (technical mixture and metabolites)	U036	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Dieldrin	60571	2,7:3,6-dimethanonaphth[2,3-b]oxirene, 3,4,5,6,9,9-hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-, (1aalpha, 2beta, 2aalpha, 3beta, 6beta, 6aalpha, 7beta, 7aalpha)-	P037	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Endrin aldehyde	7421934	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Heptachlor epoxide	1024573	NA	NA	1	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbl. 5-21
Parcel 7	UST-530B	Arochlor-1260	11096825	Arochlors, PCBs	NA	10	Unknown	1988 to 1998	R	E, Sec. 5.5 and Tbls. 5-20 and 5-22 to 5-23
Parcel 8	MAW-6	*Agricultural well - no contamination*	NA	NA	NA	NA	NA	NA	NA	A, Tbl. F-1
Parcel 8	MFL-1B	JP-5	NA	NA	NA	NA	Unknown	1964 to 1997	S	A, F-1 and I, App. B - File No. MFL-01
Parcel 8	MMS-2 G-L	Fuel	NA	NA	NA	NA	Unknown	1988	R	A, F-1 and I, App. B - File No. MMS-2
Parcel 8	ST-68 D,E,F	*PR/VSI indicated no hazardous waste storage and no visible evidence of a release.*	NA	NA	NA	NA	NA	NA	NA	A, Tbl. F-1 and I, App. B - File No. ST-68
Parcel 8	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 10	AD-06	*No hazardous waste used or stored here, trench was part of heavy earthmoving equipment training area*	NA	NA	NA	NA	NA	1966	NA	A, Tbl. F-1
Parcel 10	AD-4	Aluminum	NA	NA	NA	NA	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Beryllium	NA	NA	NA	NA	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Chromium	7440473	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Lead	7439921	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Molybdenum	7439987	NA	NA	NA	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Vanadium	NA	NA	NA	NA	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Benzo(k)fluoranthene	207089	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Fluoranthene	206440	Benzo(j,j)fluorene	U120	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Phenanthrene	85018	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 10	AD-4	Pyrene	129000	NA	NA	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Acetone	67641	2-propanone	U002	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Carbon disulfide	75150	NA	P022	5,000	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Chloroform	67663	Trichloromethane	U044	5,000	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	1,2-dichlorobenzene	95501	o-dichlorobenzene	U070	1,000	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Acetonitrile	75058	NA	U003	1	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Arochlor-1260	11096825	Arochlors, PCBs	NA	10	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AD-4	Total Recoverable Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1966	D, R	B, Tbls. 5-40 and 5-41
Parcel 10	AST-537 (SAT-11)	Solvents	NA	NA	NA	NA	Unknown	???? to 1997	S	A, Tbl. 5-6
Parcel 10	MAE-01	Silica sand (sandblasting)	NA	NA	NA	NA	Unknown	1988 to 1999	S, R	H, App. B - File No. MAE-01
Parcel 10	MAE-01	Aluminum oxide	1344281	NA	NA	NA	Unknown	1988 to 1999	S, R	H, App. B - File No. MAE-01
Parcel 10	MAE-01	Paint debris	NA	NA	NA	NA	Unknown	1988 to 1999	S, R	H, App. B - File No. MAE-01
Parcel 10	MWA-21	Waste oil	NA	NA	NA	NA	Unknown	1989 to 1999	D	H, App. B - File No. MWA-21
Parcel 10	MWA-21	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	1989 to 1999	NA	H, App. B - File No. MWA-21
Parcel 10	MWA-5	Waste oil	NA	NA	NA	NA	Unknown	???? to 1999	D	A, Tbl. F-1
Parcel 10	MWA-5	Detergents	NA	NA	NA	NA	Unknown	???? to 1999	D	H, App. B - File No. MWA-05
Parcel 10	MWA-5	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	???? to 1999	NA	H, App. B - File No. MWA-05
Parcel 10	ST-25	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1989 to 1991	R	C, Sec. 5.2 - Att. 8 Tbl. 1-1
Parcel 10	ST-25	Mercury	7439976	NA	U151	1	Unknown	1989 to 1991	R	C, Sec. 5.2 - Att. 8 Tbl. 1-1
Parcel 10	ST-25	4,4'-DDE	72559	DDE	NA	1	Unknown	1989 to 1991	R	C, Sec. 5.2 - Att. 8 Tbl. 1-1
Parcel 10	ST-25	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1989 to 1991	R	C, Sec. 5.2 - Att. 8 Tbl. 1-1
Parcel 10	ST-25	Xylenes	1330207	Dimethylbenzene	U239	1,000	Unknown	1989 to 1991	R	C, Sec. 5.2 - Att. 8 Tbl. 1-1
Parcel 10	ST-25	Grease	NA	NA	NA	NA	Unknown	1989 to 1991	S	A, Tbl. F-1
Parcel 10	ST-25	JP-5	NA	NA	NA	NA	Unknown	1989 to 1991	S	A, Tbl. F-1
Parcel 10	ST-25	Aircraft soap	NA	NA	NA	NA	Unknown	1989 to 1991	S	A, Tbl. F-1
Parcel 10	ST-25	Speedy-Dry adsorbent	NA	NA	NA	NA	Unknown	1989 to 1991	S	A, Tbl. F-1
Parcel 10	ST-26	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Mercury	7439976	NA	U151	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	4,4'-DDE	72559	DDE	NA	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	PCBs and Pesticides	NA	NA	NA	NA	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Acetone	67461	2-propanone	U002	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Methylene	NA	NA	NA	NA	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Benzo(g,h,I)perylene	191242	NA	NA	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Chrysene	218019	1,2-benzphenathrene	U050	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Dibenzo(a,h)anthracene	53703	Dibenz(a,h)anthracene, 2:5,6-dibenzanthracene	U063	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Fluoranthene	206440	Benzo(j,j)fluorene	U120	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Phenanthrene	85018	NA	NA	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Pyrene	129000	NA	NA	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Cyanide	57125	NA	P030	1	Unknown	1991 to 1999	R	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Fuels	NA	NA	NA	NA	Unknown	1991 to 1999	S	C, Sec. 5.3 - Att. 9 Tbl. 1-1
Parcel 10	ST-26	Oil	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 10	ST-26	Hydraulic oil	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 10	ST-26	Lubricant oil	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 10	ST-26	Solvents	NA	NA	NA	NA	Unknown	1991 to 1999	S	A, Tbl. F-1
Parcel 10	ST-27	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Mercury	7439976	NA	U151	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	4,4'-DDE	72559	DDE	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Anthracene	120127	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Benzo(g,h,I)perylene	191242	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Chrysene	218019	1,2-benzphenathrene	U050	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Dibenzo(a,h)anthracene	53703	Dibenz(a,h)anthracene, 2:5,6-dibenzanthracene	U063	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Fluoranthene	206440	Benzo(j,j)fluorene	U120	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Indeno(1,2,3-cd)pyrene	193395	1,10-(1,2-phenylene)pyrene	U137	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Phenanthrene	85018	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Pyrene	129000	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 10 Tbl. 1-1
Parcel 10	ST-27	Aircraft soap	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 10	ST-28A	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	Mercury	7439976	NA	U151	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	4,4'-DDE	72559	DDE	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	Chlorobenzene	108907	NA	U037	100	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	Cyanide	57125	NA	P030	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 11 Tbl. 1-2
Parcel 10	ST-28A	Fuel oil	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 10	ST-28A	Hydraulic fluids	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 10	ST-28A	Combustible liquids	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 10	ST-76	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1992 to 1995	R	D, Sec. 5.2 - Att. 20 Tbl. 1-2
Parcel 10	ST-76	Mercury	7439976	NA	U151	1	Unknown	1992 to 1995	R	D, Sec. 5.2 - Att. 20 Tbl. 1-2
Parcel 10	ST-76	Cyanide	57125	NA	P030	1	Unknown	1992 to 1995	R	D, Sec. 5.2 - Att. 20 Tbl. 1-2
Parcel 10	ST-89	*Helicopter repair area. No hazardous waste reported stored/disposed of. Unit integrity good.*	NA	NA	NA	NA	NA	1987 to 1998	NA	A, Tbls. 5-3 and F-1
Parcel 10	TOW-19	Waste oil	NA	NA	NA	NA	Unknown	1989 to 1999	S	A, Tbl. F-1
Parcel 10	TOW-19	Fuels	NA	NA	NA	NA	Unknown	1989 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 10	TOW-19	Grease	NA	NA	NA	NA	Unknown	1989 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 10	TOW-19	Detergent	NA	NA	NA	NA	Unknown	1989 to 1999	S	A, Tble F-1
Parcel 10	TOW-19	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1989 to 1999	NA	H, App. B - File No. TOW-19
Parcel 10	TOW-6	Waste oil	NA	NA	NA	NA	Unknown	1984 to 1999	S	A, Tbl. F-1 and H, App. B - File No. TOW-19
Parcel 10	TOW-6	Fuels	NA	NA	NA	NA	Unknown	1984 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 10	TOW-6	Detergents	NA	NA	NA	NA	Unknown	1984 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 10	TOW-6	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1984 to 1999	NA	H, App. B - File No. TOW-06
Parcel 11	SAT-14	*Possible AST identified in PR report, but no info documenting a tank was found*	NA	NA	NA	NA	NA	NA	NA	A, Tbl. F-1
Parcel 12	AMS-3	*Aerial photo feature. Addendum to PR/VSI indicated no visible/reported releases, no hazardous waste storage*	NA	NA	NA	NA	NA	1953	NA	G, App. B - File No. AMS-03
Parcel 12	AST-568 (SAT-13)	Noncombustible waste	NA	NA	NA	NA	Unknown	???? to 1999	S	A, Tbl. 5-6
Parcel 12	DSD-3	Arsenic	7440382	NA	NA	NA	Unknown	???? to 1985	R	B, Tbl. 5-174
Parcel 12	DSD-3	Cadmium	7440439	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 12	DSD-3	Chromium	7440473	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Lead	7439921	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173, 5-174, and 5-175
Parcel 12	DSD-3	Molybdenum	7439987	NA	NA	NA	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Acetone	67641	2-propanone	U002	1	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Carbon disulfide	75150	NA	P022	5,000	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Methyl ethyl ketone	78933	2-butanone, MEK	U159	1	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Toluene	108883	Methyl benzene	U220	1,000	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Acenaphthene	83329	NA	NA	NA	Unknown	???? to 1985	R	C, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Anthracene	120127	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Benzo(k)fluoranthene	207089	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Benzo(g,h,i)perylene	191242	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-175
Parcel 12	DSD-3	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	???? to 1985	R	B, Tbl. 5-175
Parcel 12	DSD-3	Chrysene	218019	1,2-benzphenathrene	U050	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Dibenzo(a,h)anthracene	53703	Dibenz(a,h)anthracene, 2:5,6-dibenzanthracene	U063	1	Unknown	???? to 1985	R	, Tbl. 5-175
Parcel 12	DSD-3	Fluoranthene	206440	Benzo(j,k)fluorene	U120	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Fluorene	86737	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Indeno(1,2,3-cd)pyrene	193395	1,10-(1,2-phenylene)pyrene	U137	1	Unknown	???? to 1985	R	B, Tbl. 5-175
Parcel 12	DSD-3	Phenanthrene	85018	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Pyrene	129000	NA	NA	1	Unknown	???? to 1985	R	B, Tbl. 5-173, 5-174, and 5-175
Parcel 12	DSD-3	Dimethyl sulfide	NA	NA	NA	NA	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Methyl Disulfide	NA	NA	NA	NA	Unknown	???? to 1985	R	B, Tbl. 5-173
Parcel 12	DSD-3	Arochlor-1260	11096825	Arochlors, PCBs	NA	10	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Total Recoverable Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	???? to 1985	R	B, Tbl. 5-173 and 5-175
Parcel 12	DSD-3	Waste oil	NA	NA	NA	NA	Unknown	???? to 1985	D	A, Tbl. F-1 and B, Sec. 5.4.2
Parcel 12	DSD-3	JP-5	NA	NA	NA	NA	Unknown	???? to 1985	D	A, Tbl. F-1 and B, Sec. 5.4.2
Parcel 12	DSD-3	Hydraulic fluids	NA	NA	NA	NA	Unknown	???? to 1985	D	A, Tbl. F-1 and B, Sec. 5.4.2
Parcel 12	MAE-2	Paints (polyurethane-based)	NA	NA	NA	NA	Unknown	1991 to 1999	R	H, App. B - File No. MAE-02
Parcel 12	MAE-7	Helicopter engine exhaust	NA	NA	NA	NA	Unknown	???? to 1999	D	A, Tbl. 5-4
Parcel 12	MWA-10	Waste oil	NA	NA	NA	NA	Unknown	???? to 1999	D	A, Tbl 5-9
Parcel 12	MWA-10	Detergents	NA	NA	NA	NA	Unknown	???? to 1999	D	A, Tbl 5-9; and H, App. B - File No. MWA-10
Parcel 12	MWA-10	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	???? to 1999	NA	H, App. B - File No. MWA-10
Parcel 12	MWA-11	Waste oil	NA	NA	NA	NA	Unknown	???? to 1999	D	A, Tbl. 5-9 and H, App. B - File No. MWA-11
Parcel 12	MWA-11	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	???? to 1999	NA	H, App. B - File No. MWA-11
Parcel 12	ST-11A	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1991 to 1995	R	C, Sec. 5.3 - Att. 4 Tbl. 1-1
Parcel 12	ST-11A	Mercury	7439976	NA	U151	1	Unknown	1991 to 1995	R	C, Sec. 5.3 - Att. 4 Tbl. 1-1
Parcel 12	ST-11A	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1991 to 1995	R	C, Sec. 5.3 - Att. 4 Tbl. 1-1
Parcel 12	ST-11A	Petroleum oil	NA	NA	NA	NA	Unknown	1991 to 1995	S	A, Tbl. F-1
Parcel 12	ST-11A	Lubricant oil	NA	NA	NA	NA	Unknown	1991 to 1995	S	A, Tbl. F-1
Parcel 12	ST-11A	Batteries	NA	NA	NA	NA	Unknown	1991 to 1995	S	A, Tbl. F-1
Parcel 12	ST-11A	Cleaning solvents	NA	NA	NA	NA	Unknown	1991 to 1995	S	A, Tbl. F-1
Parcel 12	ST-11B	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	???? to 1991	R	C, Sec. 5.2 - Att. 4 Tbl. 1-1
Parcel 12	ST-11B	Petroleum oil	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 12	ST-11B	Lubricant oil	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 12	ST-11B	Batteries	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1
Parcel 12	ST-11B	Cleaning solvents	NA	NA	NA	NA	Unknown	???? to 1991	S	A, Tbl. F-1

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 12	ST-28B	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Mercury	7439976	NA	U151	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	4,4'-DDE	72559	DDE	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Anthracene	120127	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Benzo(g,h,I)perylene	191242	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Carbazole					Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Chrysene	218019	1,2-benzphenathrene	U050	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Fluoranthene	206440	Benzo(j,j)fluorene	U120	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Fluorene	86737	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Indeno(1,2,3-cd)pyrene	193395	1,10-(1,2-phenylene)pyrene	U137	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Phenanthrene	85018	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Pyrene	129000	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 12 Tbl. 1-1
Parcel 12	ST-28B	Fuel oil	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 12	ST-28B	Hydraulic fluids	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 12	ST-28B	Combustible liquids	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 12	ST-34A	Methyl ethyl ketone	78933	2-butanone, MEK	U159	1	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Toluene	108883	Methyl benzene	U220	1,000	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Synthetic hydraulic fluids	NA	NA	NA	NA	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Corrosion-preventative compounds	NA	NA	NA	NA	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Adhesives	NA	NA	NA	NA	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Flammable liquids	NA	NA	NA	NA	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	Dessicant poison	NA	NA	NA	NA	Unknown	1991 to 1999	S	H, App. B - File No. ST-34A
Parcel 12	ST-34A	*PR/VSI indicated no visible/reported releases identified.*	NA	NA	NA	NA	NA	1991 to 1999	NA	H, App. B - File No. ST-34A
Parcel 12	ST-34B	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	???? To 1991	R	C, Sec. 5.3 - Att. 17 Tbl. 1-1
Parcel 12	ST-34B	Mercury	7439976	NA	U151	1	Unknown	???? To 1991	R	C, Sec. 5.3 - Att. 17 Tbl. 1-1
Parcel 12	ST-34B	Acetone	67641	2-propanone	U002	1	Unknown	???? To 1991	R	C, Sec. 5.3 - Att. 17 Tbl. 1-1
Parcel 12	ST-34B	Xylenes	1330207	Dimethylbenzene	U239	1,000	Unknown	???? To 1991	R	C, Sec. 5.3 - Att. 17 Tbl. 1-1
Parcel 12	ST-34B	Hydraulic fluids	NA	NA	NA	NA	Unknown	???? To 1991	S	A, Tbl. F-1
Parcel 12	ST-34B	Various chemicals	NA	NA	NA	NA	Unknown	???? To 1991	S	A, Tbl. F-1
Parcel 12	ST-69	*PR/VSI indicated no hazardous waste storage and no visible/reported releases identified.*	NA	NA	NA	NA	NA	NA	NA	H, App. B - File No. ST-69
Parcel 12	ST-74	*Storage unit identified in CERFA EBS, but field invest. Indicated no such unit*	NA	NA	NA	NA	NA	NA	NA	A, Tbl. F-1
Parcel 12	TOW-10	Waste oil	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. F-1 and H, App. B - file No. TOW-10
Parcel 12	TOW-10	Detergents	NA	NA	NA	NA	Unknown	1987 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-10	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1987 to 1999	NA	H, App. B - File No. TOW-10
Parcel 12	TOW-9 A	Test cell cooling water	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 A	Waste oil	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. F-1
Parcel 12	TOW-9 A	Cleaners	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 A	Fuels	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 B	Test cell cooling water	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 B	Waste oil	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 B	Cleaners	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 B	Fuels	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 C	Test cell cooling water	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 C	Waste oil	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 C	Cleaners	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 12	TOW-9 C	Fuels	NA	NA	NA	NA	Unknown	1985 to 1999	S	A, Tbl. 5-8 and F-1

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 14	MWA-19	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	NA	1986 to 1999	NA	H, App. B - File No. MWA-19
Parcel 14	TOW-17	Waste oil	NA	NA	NA	NA	Unknown	1986 to 1999	S	A, Tbl. F-1
Parcel 14	TOW-17	Detergents	NA	NA	NA	NA	Unknown	1986 to 1999	S	A, Tbl. 5-8 and F-1
Parcel 14	TOW-17	*PR/VSI indicated no visible or reported releases identified.*	NA	NA	NA	NA	NA	1986 to 1999	NA	H, App. B - File No. TOW-17
Parcel 25	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 26	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 30	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 31	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 32	AMS-5	*Aerial photo feature. Addendum to PR/VSI indicated no visible/reported releases, no hazardous waste storage*	NA	NA	NA	NA	NA	1953	NA	A, Tbl. F-1 and G, App. B - File No. AMS-05
Parcel 32	--	Pesticides, unknown type	NA	NA	NA	NA	Unknown	Before 1942 to approx. 1996	R	I, Sec. 1.1
Parcel 40	MWA-6	Waste oil	NA	NA	NA	NA	Unknown	1950s to 1996	D	A, Tbl. F-1
Parcel 40	ST-29	Mercury	7439976	NA	U151	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Methylene chloride	75092	Dichloromethane	U080	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Acenaphthylene	208968	NA	NA	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Anthracene	120127	NA	NA	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Benzo(g,h,I)perylene	191242	NA	NA	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Dibenzo(a,h)anthracene	53703	Dibenz(a,h)anthracene, 2:5,6-dibenzanthracene	U063	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	Indeno(1,2,3-c,d)pyrene	193395	1,10-(1,2-phenylene)pyrene	U137	1	Unknown	1989 to 1994	R	C, Sec. 5.3 - Att. 13 Tbl. 1-2
Parcel 40	ST-29	JP-5	NA	NA	NA	NA	Unknown	1989 to 1994	S	A, Tbl. F-1
Parcel 40	ST-29	Hydraulic fluids	NA	NA	NA	NA	Unknown	1989 to 1994	S	A, Tbl. F-1
Parcel 40	ST-29	Freon	NA	NA	NA	NA	Unknown	1989 to 1994	S	A, Tbl. F-1
Parcel 40	ST-29	Polyurethane	NA	NA	NA	NA	Unknown	1989 to 1994	S	A, Tbl. F-1
Parcel 40	ST-29	Speedy-Dry adsorbent	NA	NA	NA	NA	Unknown	1989 to 1994	S	A, Tbl. F-1
Parcel 40	ST-30	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Mercury	7439976	NA	U151	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	4,4'-DDD	72548	DDD, DDE, 1,1'(2,2-dichloroethylidene)bis[2-chlorobenzene]	U060	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	4,4'-DDE	72559	DDE	NA	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Xylenes	1330207	Dimethylbenzene	U239	1,000	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Bis(2-ethylhexyl)phthalate	117817	Diethylhexyl phthalate, [bis(2-ethylhexyl)] ester, 1,2-benzenedicarboxylic acid,	U028	1	Unknown	1990 to 1995	R	C, Sec. 5.3 - Att. 14 Tbl. 1-1
Parcel 40	ST-30	Transmission oil	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1
Parcel 40	ST-30	Grease	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1
Parcel 40	ST-30	Isopropyl alcohol	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1
Parcel 40	ST-30	Lubricant oil	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1
Parcel 40	ST-30	Propellant propane	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1
Parcel 40	ST-30	Corrosion-preventative oil	NA	NA	NA	NA	Unknown	1990 to 1995	S	A, Tbl. F-1

ATTACHMENT 3
HAZARDOUS SUBSTANCE NOTIFICATION TABLE[a]

Parcel Number	AOC Site	Hazardous Substances[b]	CAS No.	Regulatory Synonym	RCRA Waste No.	Reportable Quantity[c] (Pounds)	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Reference/ Page No.
Parcel 40	ST-32A, B, C	aircraft cleaning compound	NA	NA	NA	NA	Unknown	???? To 1995	S	A, Tbl F-1 and H, App. B - File No. ST-32
Parcel 40	ST-32A, B, C	engine gas	NA	NA	NA	NA	Unknown	???? To 1995	S	A, Tbl F-1 and H, App. B - File No. ST-32
Parcel 40	ST-32A, B, C	path cleaner	NA	NA	NA	NA	Unknown	???? To 1995	S	A, Tbl F-1 and H, App. B - File No. ST-32
Parcel 40	ST-32A, B, C	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	Unknown	???? To 1995	NA	H, App. B - File No. ST-32
Parcel 40	ST-33	Total Petroleum Hydrocarbons	NA	NA	NA	NA	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Mercury	7439976	NA	U151	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	4,4'-DDE	72559	DDE	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	4,4'-DDT	50293	DDT, 1,1'-(2,2,2-trichloroethylidene)bis[4-chlorobenzene]	U061	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Acenaphthylene	208968	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Anthracene	120127	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Benzo(a)anthracene	56553	Benz(a)anthracene, 1,2-benzanthracene	U018	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Benzo(a)pyrene	50328	3,4-benzopyrene	U022	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Benzo(b)fluoranthene	205992	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Benzo(g,h,I)perylene	191242	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Chrysene	218019	1,2-benzphenathrene	U050	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Dibenzo(a,h)anthracene	53703	Dibenz(a,h)anthracene, 2:5,6-dibenzanthracene	U063	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Fluoranthene	206440	Benzo(j,j)fluorene	U120	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Indeno(1,2,3-cd)pyrene	193395	1,10-(1,2-phenylene)pyrene	U137	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Phenanthrene	85018	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	Pyrene	129000	NA	NA	1	Unknown	1989 to 1995	R	C, Sec. 5.3 - Att. 16 Tbl. 1-1
Parcel 40	ST-33	JP-5	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 40	ST-33	Hydraulic fluids	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 40	ST-33	Speedy-Dry adsorbent	NA	NA	NA	NA	Unknown	1989 to 1995	S	A, Tbl. F-1
Parcel 40	TOW-7	Waste oil	NA	NA	NA	NA	Unknown	1989 to 1997	S	A, Tbl. F-1 and H, App. B - File TOW-7
Parcel 40	TOW-7	Detergent	NA	NA	NA	NA	Unknown	1989 to 1997	S	A, Tbl. F-1 and H, App. B - File TOW-7
Parcel 40	TOW-7	*PR/VSI indicated no visible/reported releases identified, unit integrity good.*	NA	NA	NA	NA	Unknown	1989 to 1997	S	A, Tbl. F-1 and H, App. B - File TOW-7
NA	Facilitywide	Asbestos	1332214	NA	NA	NA	Unknown	1942 to 1999	Used	
NA	Facilitywide	Paints (lead-based)	NA	NA	NA	NA	Unknown	1942 to 1999	Used	
NA	Various buildings	Transformers containing PCBs	1336363	Arochlors, polychlorinated biphenyls	NA	NA	Unknown	1942 to 1999	Used	

Notes:

[a]Data from NIOSH website (http://www.siri.uvm.edu.nioshdb)

[b]This table was prepared in accordance with 40 CFR 373 and 40 CFR 302.4 and contains categories (a "Reference" column has been added to the format)

[c]NA - The reported substance is not listed on the 40 CFR 302.4 table and therefore has no corresponding reportable quantity

References:

A-Final EBS (BNI March 2001)
B-Draft Final RCRA Facility Assessment Report, Vol. I and II of V (BNI April 1997)
V-Draft No Further Action Report, Vol. I of III (OHM May 1998) - addresses ST-type AOCs
D-Technical Closure Memorandum for Site ST-3 (OHM March 1997)
E-Final No Further Action Report, Vol. I of II for Sites MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 (OHM June 2001)
F-Draft RCRA Facility Assessment Visual Site Inspection Report for Three Potential AOCs (BNI February 1996)
G-Addendum to Revised PR/Draft VSI Report, Facility Assessment at Marine Corps Air Station Tustin, California (November 1992)
H-Facility Assessment, Revised Preliminary Review/Draft Visual Site Inspection Report for Facility Assessment at MCAS Tustin (JEG March 1992)
I-Draft Final Pesticides (and Associated Metals) Investigation Report, Marine Corps Air Station Tustin, California (July 1996)

Acronyms/Abbreviations:

AD - air photo, possible disposal
AOC - area of concern
AMS - aerial photograph, miscellaneous, stain, possible spill
App. - appendix
AST - aboveground storage tank
Att. - attachment
BNI - Bechtel National, Inc.
CAS - Chemical Abstracts Services
CFR - code of federal register
DSD - disposal, storm drain
EBS - Environmental Baseline Survey
DDD - Dichlorodiphenyldichlorethane
DDE - Dichlorodiphenyldichloroethene
DDT - Dichlorodiphenyltrichloroethane
JEG - Jacobs Engineering Group
JP-5 - Jet fuel
MAE - miscellaneous, air emission
MAW - miscellaneous, abandoned well
MCAS - Marine Corps Air Station
MDA - miscellaneous, potential disposal area
MEK - Methyl ethyl ketone
MFL - miscellaneous, fuel line
MGR - miscellaneous, grease rack
MMS - miscellaneous, major spill
MTBE - methyl tertiary butyl ether
MWA - miscellaneous, wash area
NA - Not available
NIOSH - National Institute of Occupational Safety and Health
No. - number
PCB - Polychlorinated biphenyls
PR/VSI - preliminary review/visual site inspection
RCRA - Resource Conservation and Recovery Act
SAT - storage, aboveground tank
Sec. - section
ST - storage, temporary
Tbl. - table
TOW - treatment, oil/water separator
UST - underground storage tank

ATTACHMENT 3 - UST/AST SUBSTANCE NOTIFICATION TABLE

Parcel Number	UST/AST	UST/AST Substances[a]	Quantity	Date(s) of Storage and/or Operation	Stored (S), Released (R), or Disposed (D) of	Cleanup Criteria (mg/kg)	Reference/ Page No.
Parcel 5	UST-536	Waste oil	Unknown	1988 to 1999	S	1000 or below	A, Tbl. 5-5
Parcel 7	UST-530A	Diesel	Unknown	1988 to 1997	S	1000 or below	A, Tbl. 5-5
Parcel 7	UST-530B	Diesel	Unknown	1988 to 1998	R	1000 or below	E, Sec. 5.5 and Tbls. 5-20 to 5-24
Parcel 7	UST-530B	Gasoline	Unknown	1988 to 1998	R	1000 or below	E, Sec. 5.5 and Tbls. 5-20, 5-22, and 5-24
Parcel 7	UST-530B	Total Recoverable Petroleum Hydrocarbons	Unknown	1988 to 1998	R	1000 or below	E, Tbl. 5-20
Parcel 7	UST-530B	Waste oil	Unknown	1988 to 1998	S	1000 or below	A, Tbl. 5-5
Parcel 8	AST-198A (SAT-2A)	JP-5	Unknown	???? to 1998	S	1000 or below	A, Tbl. 5-6
Parcel 8	AST-198B (SAT-2B)	JP-5	Unknown	???? to 1998	S	1000 or below	A, Tbl. 5-6
Parcel 10	UST-508 (SI-2A)	Waste oil	Unknown	1985 to 1998	S	1000 or below	A, Tbl. 5-5
Parcel 12	UST-273 (SI-3A)	Waste oil	Unknown	1987 to 1999	S	1000 or below	A, Tbl. 5-5
Parcel 12	AST-273A (SAT-9)	JP-5	Unknown	???? to 1999	S	1000 or below	A, Tbl. 5-6
Parcel 12	AST-273B (SAT-10)	JP-5	Unknown	???? to 1999	S	1000 or below	A, Tbl. 5-6
Parcel 14	UST-543	Waste oil	Unknown	1988 to 1999	S	1000 or below	A, Tbl. 5-5
Parcel 33	AST-24C	Heating fuel	Unknown	Unknown	S	1000 or below	A, Tbl. 5-6
Parcel 40	UST-181	Waste oil	Unknown	1967 to 1997	S	1000 or below	A, Tbl. 5-5

Notes:
a -These UST/ASTs contain petroleum products which fell within the scope of the CERCLA petroleum exclusion set forth in CERCLA Section 101(14).

References:
A - Final EBS (BNI March 2001)
E - Final No Further Action Report, Vol. I of II for Sites MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 (OHM June 2001)

Acronyms/Abbreviations:
AST - aboveground storage tank
BNI - Bechtel National, Inc.
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980
EBS - Environmental Baseline Survey
DDD - dichlorodiphenyldichlorethane
DDE - dichlorodiphenyldichloroethene
DDT - dichlorodiphenyltrichloroethane
JP-5 - jet fuel
MAE - miscellaneous, air emission
MDA - miscellaneous, potential disposal area
mg/kg - milligrams per kilogram
MWA - miscellaneous, wash area
NA - not available
SAT - storage, aboveground tank
Sec. - section
Tbl. - table
TOW - treatment, oil/water separator
UST - underground storage tank
Vol. - volume

ATTACHMENT 4
COMMENTS/RESPONSE TO COMMENTS

Department of Toxic Substances Control

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

September 19, 2001

Mr. Keith S. Forman
BRAC Environmental Coordinator
Naval Facilities Engineering Command
BRAC Program Office
1230 Columbia Street, Suite 1100
San Diego, California 92101-8517

Dear Mr. Forman:

On September 10, 2001, The Department of Toxic Substances Control (DTSC) received the final Finding of Suitability to Transfer (FOST) document for certain parcels at the closed Tustin Marine Corps Air Facility (MCAF). This FOST was dated September 6, 2001 and applied to Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, 42, and portions of Parcels 40 and 41. Based on DTSC's review of the information provided by the Department of Navy (DON) in this document, DTSC concurs with a Finding of Suitability to Transfer for all parcels, except Parcels 4, 31 and portions of 40, for transfer out of DON's control. Except for those three parcels, DTSC finds these properties to be environmentally suitable for their intended use.

DTSC is unable to concur with the suitability of Parcel 31 for transfer. The 1998 Specific Plan/Reuse Plan Errata for Tustin MCAF identifies Parcel 31 as the site for a planned kindergarten through sixth grade school. Pursuant to the California Education Code, section 17210 et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. This law requires that DTSC make a determination as to the suitability of the property for school use based on this review. The review process includes an evaluation of whether hazardous materials on the property have been or could be released that would endanger students. Because this separate environmental review has not been conducted for Parcel 31, DTSC cannot determine if this parcel is suitable for its intended use.

DTSC is unable to concur with the suitability of Parcel 4 and portions of Parcel 40 for transfer. These parcels may have lead based paint (LBP) that has been released to the soil. DTSC maintains that lead in soil from LBP is a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) release to the environment. Building 176 (Parcel No. 4), Buildings 180, 181, 182 (Parcel No. 40), and Structure 237 (Parcel No. 4) were all constructed prior to 1978, the year when lead based paint products were discontinued. As the surfaces of these buildings may have LBP that could be released to the soil, DON should conduct soil sampling to determine whether soils surrounding these buildings contain concentrations of lead from LBP which may pose a threat to human health and the environment. Until such sampling is performed, DTSC cannot determine whether, pursuant to CERCLA 120(a)(3), all actions have been taken at these two parcels to remedy potential releases of lead to the environment from LBP. DTSC also disagrees with DON's assertion in the FOST that it is not required to evaluate or abate LBP, including releases to soil, particularly after property transfer.

DTSC's non-concurrence on Parcels 4, 31, and portions of 40 is consistent with a previous decision made on August 2, 2001 for a similar FOST. At that time DTSC decided not to concur with the transfer of Parcels 21 and 39 because separate environmental reviews required by the California Education Code had not been conducted to determine if these parcels were suitable for school uses. On August 31, 2001 DTSC learned that DON had finalized that FOST without any dialogue with DTSC over this decision. DTSC is disappointed with DON's unilateral action and remains concerned about potential hazardous substance releases on certain parcels at Tustin MCAF that could threaten public health and the environment. It is requested that DON discuss with DTSC such concerns prior to the finalization of this latest FOST.

Thank you for providing DTSC with the opportunity to review this Finding of Suitability. If you have any questions regarding this letter, please contact Mr. Ram Peddada, Ms. Jennifer Rich or me at (714) 484-5456.

Sincerely,

John Scandura, Chief
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RESPONSE TO DTSC CONCURRENCE LETTER
Final Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

September 19, 2001 Letter from Mr. John Scandura, California Department of Toxic Substances Control

	GENERAL COMMENTS	RESPONSE
1.	See copy of DTSC letter dated September 19, 2001.	The September 19, 2001 DTSC letter indicates that they are "unable to concur" on the suitability of Parcels 4, 31 and portions of 40 for transfer. Parcel 31 is slated for use as a public school and, in order to qualify for state funding, will require a separate and comprehensive environmental review pursuant to California Education Code section 17210. DTSC believes that this must be done prior to transferring the property. The Navy stands by the language in the FOST which indicates that all remedial actions necessary have been taken to support the CERCLA covenant warranty required under Section 120(h)(3)(A)(1)(ii) of CERCLA. The FOST does not attempt to certify that Parcel 31 has met standards outside of CERCLA such as the requirement cited above. The Navy believes it is appropriate for the school district involved in the construction of the school site to conduct the preliminary environmental assessment as called for under CEC section 17210. Parcel 4 and portions of Parcel 40 has several non-residential structures built prior to 1978 that have the potential to contain lead-based paint (LBP). DTSC believes that since LBP could potentially have been released into the soil surrounding the buildings, and that in their view LBP is a CERCLA release, the Navy should conduct lead-in-soil testing prior to including these areas in the FOST. DoN does not regard the release of LBP through weathering as a CERCLA release. The Navy follows the Dec 99 DoD/USDEPA Interim Final "Lead-Based Paint Guidelines for Disposal of Defense Residential Real Property - A Field Guide" and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC Section 4851, commonly referred to as "Title X"). Both Title X and the Field Guide establish exposure and cleanup standards at residential properties only. Neither Parcel 4 nor portions of Parcel 40 contain any residential buildings and therefore do not require lead-in-soil testing. The Navy has disclosed the age of the structures on these parcels and will provide a notification of the potential for LBP hazards to the transferee with the transfer documents. The Navy believes that this notification completes any actions required prior to transfer concerning the LBP issue. The conclusion reached in the FOST that Parcels 4 and 31 and portions of Parcel 40 are "suitable for transfer" will remain the Navy's determination.

Response To Comments
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

19 September 2001 Comments from: Dana Ogdon, the City of Tustin

	GENERAL COMMENTS	RESPONSE
1.	Page 1, Section 1.0, first paragraph – It is indicated that the FOST will result in a "transfer by deed". The Navy has not provided a copy of the draft deed document to the City of Tustin for review and comment. The FOST must be supportive of the final negotiated deed language, including any deed restrictions that may or may not be a part of the document. We would appreciate receiving a draft deed for the property associated with FOST #2. Also, the second paragraph describes the Finding of Suitability to Lease (FOSL) document that was prepared in support of the LIFOC for the carve-out areas. It states that the "LIFOC will…allow use of property without impeding the cleanup …while remedial action is being completed." The City of Tustin has provided separate correspondence to the Navy identifying its comments and concerns regarding the draft FOSL and continues to work with Navy staff to resolve these continuing issues. However, it should be noted that our review has determined that the FOSL language currently prohibits use of the LIFOC property until the Navy completes its cleanup activities at the affected sites. Please provide additional language in the FOST document that clarifies what uses the Navy will ultimately allow within the LIFOC areas.	A similar comment was raised in the companion FOSL. Navy letter of April 18, 2001 responded to this issue in regards to lease language that applies to deed language. In essence, the FOST is a stand alone environmental document that is used to develop specific deed language regarding environmental restrictions on the property. The FOST is not a document that is negotiated as part of the conveyance documentation. All applicable environmental deed restrictions and notification are presented in this FOST. It is inappropriate to provide text in the FOST on the use of the property in the LIFOC. This information is appropriately included in the companion FOSL for the carve-out areas. No changes were made to this document.
2.	Page 3, Section 2.2, second paragraph – The section states that regulatory concurrence for actions described in this section (and also later sections) has been secured. The document should reference attached copies of regulatory concurrence anytime the Navy makes such an assertion. Page 9, Section 2.16, first paragraph – the section states "the Marble Mountain Park buildings are vacant and are proposed for demolition after transfer." Please correct this statement to reflect the fact that the approved Reuse Plan for MCAS Tustin does not mandate that these housing units will be demolished. The City of Tustin has submitted to the Navy an Economic Development Conveyance that requests the transfer of all the Marble Mountain housing units. It is currently uncertain whether all, some or none of the units can be rehabilitated for civilian residential purposes. Should the City's EDC request for the site be denied, the HUD approved Reuse Plan and the Redevelopment Act stipulates that at least 14 of the 402 existing family housing units within Parcel 37 be directly transferred from the Navy to the City of Tustin (unit locations to be determined later). Please correct the current language to reflect this information.	Attachment 2 contains all regulatory letters of concurrence for each assertion made by the Navy in this FOST. This reference is found in Section 6. The text in the second paragraph appropriately refers to the tables that indicate status and ECP type. No changes will be made to the document. Acknowledged. The changes will be made throughout the document to reflect this comment. In regards to your comment on the EDC, the FOST documents do not discuss property recipients or reuse issues.

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

	GENERAL COMMENTS	RESPONSE
3.	Page 16, Section 8.1 – The City of Tustin has previously provided comments on FOST #1 concerning the past utilization of pesticides potentially affecting parcels 38 and 39 (part of the previous FOST #1). Due to the fact that parcels 38 and 39 abut parcel 37, those previous comments are restated here for response by the Navy and clarification in the subject FOST #2 document. "The Navy has previously indicated [in FOST #1] that DDT and selenium in groundwater were not considered to be a significant exposure pathway for the parcel 39 site. FOST #1 indicates that the RI for OU-1 "did not indicate the presence of pesticides in groundwater beneath parcels 38 and 39." The City believes that this issue may not have been adequately addressed since there appears to be some confusion as to where pesticides exist at the parcel 37 property. The subject FOST document should specifically state that testing for pesticides in soil and groundwater has occurred and the state and federal regulators have formally expressed their concurrence that parcel 37 is suitable for transfer for residential purposes.	The Navy feels the pesticide usage at the base has already been adequately addressed in the Draft Final Pesticides and Associated Metals Investigative Report issued in 1996. This document presents the results from soil sampling collected to evaluate the pesticides and metals that were present in soil as a result of past agricultural activities at MCAS Tustin. The report concluded that the residual levels of pesticides in soil do not constitute a threat to human health or the environment. The BCT agreed with the findings of the report. The PEA and RI Report for Operable Units 1 and 2 included groundwater sampling at Parcels 38 and 39. Parcels 38 and 39 were considered to be good examples of worst-case scenarios for past pesticide use. The results of the PEA indicated that there was no significant environmental or human health threat from pesticides under a residential scenario. Subsequent groundwater sampling results from the RI did not indicate the presence of pesticides in groundwater beneath Parcels 38 and 39. Selenium was found to be naturally occurring in groundwater and was not associated with base operations at these parcels. Based on the investigations conducted for pesticides (See Section 8.1), these parcels, and other parcels previously used for agricultural purposed (e.g., Parcel 37), are suitable for unrestricted residential use. The reports referenced in this section of the FOST will be provided to the transferee as part of the transfer documentation. No changes were made to this document.
4.	Page 16, Section 8.2 – Please clarify the state regulatory standard or law for PCB concentrations for the uses planned for parcels affected by PCBs and please provide a dated reference of prior state regulatory concurrence with the conclusion that no additional action is necessary to reuse the property as provided within the approved Reuse Plan for MCAS Tustin.	State requirements in 22 CCR 66261.24(a)(2) state that the PCB levels in transformers shall not exceed the soluble threshold limit concentration of 5 ppm and the threshold limit concentration of 50 ppm. Since the maximum concentration of transformers in these parcels are below 5 ppm (the most stringent requirement), no further action is required by the DON prior to transfer. No regulatory approval is necessary since Federal and state requirements have been met. Additionally, standards or regulations for PCB concentrations do not differ based on property reuse. No changes were made in the document.
5.	Page 17, Section 8.2 – The section states that radon levels below 4 pCi/L were detected in housing units at MCAS Tustin, and that such "low" levels require no mitigation. Please revise the document to state that 4 pCi/L would not preclude the use of parcels planned reuse for housing, etc. State regulatory concurrence with this statement is requested.	The radon survey at MCAS El Toro and Tustin was conducted as part of a nationwide survey of radon at DoD facilities. The surveys act as a screening at representative buildings at each facility to determine radon levels in these buildings. DoD policy in the Base Reuse Implementation Manual (BRIM) in regards to radon, is to ensure that any available and relevant radon assessment data pertaining to BRAC property being transferred shall be included in property transfer documents. Therefore, the radon notification is included in the FOST. Radon is just one of several environmental factors to consider (See Table 5) in determining whether a parcel is suitable to transfer. No changes were made in this document.

	GENERAL COMMENTS	RESPONSE
6.	Page 20, Section 8.8.1.1, Attachment 5 (Unresolved Comments, page 2) and Table 9, page 6 – The document indicates that friable asbestos surveys have been completed for all non-residential buildings within FOST #2. However, the document also indicates that no surveys have been done for all non-residential buildings identified in the approved Reuse Plan as "To be Determined (TBD)". This conclusion has precluded Navy completion of required ACM surveys for such buildings at the sole benefit of the Navy and detriment of the community. Friable Asbestos constitutes a release of hazardous substance. As such, it is the obligation of the Navy to provide the CERCLA warranty that all actions necessary to protect human health and the environment have been taken and that the property is suitable for reuse (including TBD buildings) for the purposes identified in the approved Reuse Plan for MCAS Tustin.	As noted in the revised Section 8.8, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed of as is through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building, and it is friable, ac essible and damaged (FAD). The Navy is obligated to provide the transferee with the results of a site-specific FAD ACM survey performed to revalidate the condition of the ACM. However, the Navy is required to conduct a FAD ACM survey only when the reuse plan calls for a building to be reused/occupied, rather than demolished. Some buildings have been designated as "To Be Determined" or "Demolition" in the reuse plan and the specific reuse is unknown. For these buildings, occupation will be prohibited and the responsibility for management of ACM in accordance with applicable laws will be assumed by the transferee. Furthermore, a FAD ACM survey is not required if ACM has never been identified in the interior of a building during any previous asbestos survey, or if an asbestos survey conducted after 1996 found no damaged ACM and there is no reason to suspect any damaged ACM is present. The 1996 date was established to be consistent with the Asbestos Hazard Emergency Response Act (AHERA), which calls for a re-inspection to assess the physical condition (i.e., good or damaged) of ACM at least once every three years. Since base closure occurred in 1999, any qualified inspection performed in 1997 or later meets the intent of these regulations (not 2000 as originally stated in the FOST).

	GENERAL COMMENTS	RESPONSE
7.	Page 22, Section 8.9 - The section states that DON policy for residential buildings applies to target housing "constructed before 1978." Since parcel 37 housing was built subsequent to that date, it can be assumed that LBP hazards are not present at parcel 37. However, the document indicates that the DON "will not conduct sampling at non-residential buildings prior to transfer." The purpose of the FOST is to determine whether the property is suitable for transfer for the purposes identified in the Reuse Plan. The document states, "any evaluation and abatement of LBP at non-residential buildings will be the responsibility of the transferee." Lead-in-soil constitutes a release of a hazardous substance. As such, it is the obligation of the Navy to provide the CERCLA warranty that all actions necessary to protect human health and the environment have been taken and that the property is suitable for reuse for the purpose identified in the approved Reuse Plan for MCAS Tustin. It is difficult to understand how that warranty can be provided without testing, remediation (if necessary) and certification by the Navy and regulators that a lead-in-soil threat does not exist in these non-residential areas. Please revise and provide regulatory concurrence for these future revisions. r	Disclosure of the potential for LBP hazards provides the transferee with notice that abatement may be required after transfer and that Federal and state requirements on LBP apply when conducting demolition activities. The responsibility for the future evaluation and abatement of the non-residential buildings will be the transferee's responsibility unless future DoD Policy and/or legislation require that the DON perform such evaluations and abatement on non-residential buildings. In the case of Marble Mountain housing area, no sampling is necessary since the building were constructed after 1978. DON's position regarding a release of LBP through weathering is that this type of release does not constitute a CERCLA release. LBP is regulated under Title X and a release to soil is considered a potential "soil-lead hazard". Per Title X, DON is required to disclose the presence of known LBP and/or lead-based paint hazards in housing and provide transferees with any lead hazard evaluation reports available. Although this disclosure requirement applies to housing areas, DON has also included the disclosure of potential for LBP hazards for non-residential buildings. The disclosure of the potential for LBP hazards at specified buildings meets the full disclosure requirements intended in Title X. All action necessary to protect human health and the environment has been taken since no known CERCLA hazardous substances exist on these parcels and full disclosure of the potential for LBP hazards (as well as notifications for asbestos, radon, etc.) will be made to the transferee. DON's position is that a release of LBP through weathering does not constitute a CERCLA release and therefore the CERCLA warranty requirement is not applicable to this type of release. In regards to planned euse, the requirements of CERCLA Section 120(h)(3) have been met for these parcels and they are suitable for transfer by deed for the purposes intended, subject to the notifications and restrictions set forth in Section 8.0 of the FOST. Additionally, disclosure of possible hazards (e.g., asbestos and LBP) has been identified in the FOST. No changes were made in this document.
8.	Page 26, Section 8.10 - With respect to School Site Considerations; the City of Tustin has stated clearly its disagreement with the Navy's standards for a suitability determination. The Navy is on notice that the CERCLA warranty will be triggered by a determinati n that the property is subsequently determined to be unacceptable for its intended reuse because of contamination which was present at the time of transfer, which is attributable to the Navy's pre-transfer activities. The Reuse Plan has previously established the intended use of parcel 31 as a school. Implementation of that use cannot later be interpreted by the Navy to be a "change". Also, any future change in property use that does not result in a change in cleanup standards would not generate a basis for a disclaimer of an otherwise valid obligation.	The text in Section 8.10 presents the environmental requirements for a school district requesting state funds for construction of a new school. School districts, not requiring state funding, and/or private schools, would be exempt from these requirements and the property would be considered suitable for transfer to this entity. Since the requirements for compliance with the California Education Code are contingent upon utilizing state funding, these requirements do not rise to the level of being an ARAR because they fail the "general applicability" test. Furthermore, the scope of work for the additional school site testing is outside the scope of CERCLA and therefore does not preclude the Navy from determining the property is suitable for transfer.

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

13 September 2001 Comments from: Melinda Bowman, the County of Orange, Public Facilities & Resources Department

	GENERAL COMMENTS	RESPONSE
1.	The FOST recommends transfer of only a portion of the property originally requested by Orange County Flood Control District (OCFCD). Property for Santa Ana-Santa Fe Channel and Peters Canyon Channel downstream of Edinger Avenue were not included.	The property for these channels will be included in a subsequent FOST for the remaining parcels not included in this FOST or the FOST signed August 2001 for parcels 3, 21, 38, 39, and portions of 40.
2.	For the remaining portions of the requested properties, the FOST states that it is anticipated that the southern portion of Parcel 41 will be transferred for use as Barranca Channel and the northern portion will be transferred for Peters Canyon Channel. Said portions of parcel 41 have not been identified as areas of environmental concern and therefore are acceptable for transfer to the OCFCD for flood control and accessory regional trail purposes.	No environmental areas of concern were located within Parcel 41; therefore, the property may be transferred for the proposed use.
3.	OCFCD is prepared to continue to maintain its channels under its existing easements for Barranca and Peters Canyon Channels should acceptance of those portions of Parcel 41 be contingent upon the County or OCFCD operating and maintaining environmentally impacted areas within MCAS Tustin. Specifically, the Department of the Navy should be informed that neither the County nor OCFCD is willing to assume responsibility for implementing the Operation and Maintenance Plan for the former landfill (OU-3 site) adjacent to Peters Canyon Channel and Santa Ana-Santa Fe Channel.	The intended purpose of the FOST is to determine if the property is suitable for transfer for the proposed purposes. This document does not address issues related to the deed for the property. The DON is aware of the County's/OCFCD's concerns regarding responsibility for operation and maintenance of the OU-3 site and will arrange to meet County and OCFCD personnel in the near future to discuss these concerns.
4.	OCFCD Resolution 97-6 authorized the submittal of an application for public benefit conveyance of federal land at MCAS Tustin for flood control and regional trail purposes. In that application, OCFCD requested fee title for an existing flood control easement for Barranca Channel within base limits (1 parcel, total of 5 acres). Figure 3 of the FOST does not accurately depict our original application request for fee title to Barranca Channel. It appears that portions of the originally requested fee title for Barranca Channel at Von Karmon Avenue were inadvertently omitted from the FOST. Consequently, the FOST should be revised accordingly and also provide more detail in the document text and drawings regarding the description of those portions of Parcel 41 that are to be transferred to OCFCD.	The FOST is not intended to provide a legal description of the properties of transfer. This information will be contained in the deed of the properties to be transferred. Therefore, specific information on the property and its legal boundaries is not appropriate in the FOST.
5.	The last sentence of Section 2.18 states "The county of Orange currently has an easement for both channels." This sentence should be revised to state "The Orange County Flood Control District currently has easements for both channels."	As requested, the change was made to Section 2.18 of the FOST.

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

03 August 2001 Comments from: the California Department of Toxic Substances Control

	COMMENT	RESPONSE
	GENERAL COMMENTS	
1.	The Final Basewide Environmental Survey (EBS) (March 2001) provides a discussion on ordnance. It mentions that there was previously one pistol/rifle range and three skeet ranges located on MCAS Tustin property. Were any of these previous ranges located on any of the parcels related to th s FOST?	No, the pistol/rifle range and the three skeet ranges previously located on MCAS Tustin property were not located on any of the parcels related to this FOST. The ranges were located on Parcels 34, 35, and 36.
2.	Throughout the FOST, references to anticipated use indicate the "the property will be transferred for commercial business". To be more accurate, please insert the word "use" after "business".	All references to anticipated use were revised as requested in the FOST. For example: "It is anticipated that Parcel 14 will be transferred for commercial/business use."
3.	Please provide page numbers on all the tables.	As requested, page numbers are provided on all tables in the FOST.
4.	Table 2, status column – Please indicate the regulatory agency that provided the NFA concurrence.	Unless otherwise noted, the NFA concurrence letters referred to in Table 2 (also included in Attachment 2) are signed by the BRAC Environmental Coordinator, the US EPA Project Manager, the RWQCB Project Manager, and the Cal-EPA, DTSC Project Manager. A footnote indicating this was added to Table 2 in the FOST.
5.	Please provide NFA concurrence letters for all the AOCs, USTs, ASTs, and Preliminary Endangerment Assessments (PEAs) associated with all transferring parcels.	The NFA concurrence letters for all AOCs, USTs, and ASTs are provided in Attachment 2 of the FOST. In addition, an NFA concurrence letter for the PEA performed at Parcel 33 (previously designated as Parcel D) is provided in Attachment 2.
6.	Table 2, AOC column – To be consistent with the NFA concurrence letters contained in Attachment 2, the numbering system should be the same. Example: instead of "AST-3A" use "AST-03A".	The numbering system used in Table 2 and the associated text of the FOST was revised as requested to be consistent with the NFA concurrence letters.
7.	Please update all the shaded areas with the most current information to date.	The FOST includes the most current information to date (all shaded areas were updated).
8.	Because the Regional Water Quality Control Board uses other than risk based clean up standards to make its no further action determinations for UST and AST sites, a brief discussion on past removal actions and the cleanup standards used at each UST and AST site should be provided for those sites where there is no DTSC review or oversight.	The RWQCB does not require risk-based standards for UST and AST site closures. All site investigations and remedial actions have been completed for the sites that the RWQCB has concurred with the recommendations for closure per the California Code of Regulations. Therefore, no additional discussion is necessary. The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.
	SPECIFIC COMMENTS	
1.	Page 1, Section 1.0, Paragraph 1, Line 5 – Please replace "including Parcels" with "consisting of".	As requested, the referenced sentence was revised and is included as follows in the FOST: "Nineteen parcels, consisting of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, portions of 40 and 41, and 42, at Marine Corps Air Station (MCAS) Tustin are proposed for transfer."
2.	Page 1, Section 1.0, Paragraph 1, Line 7 & 8 – Parcel 42 is not included in the carve-out areas. However, FOSL 2 references IRP Site 6 (Parcel 42) as a carve-out area. Please revise as needed.	A small portion of Parcel 42 is included in CO-2. The referenced sentence of the FOST was revised as follows: "Portions ("carve-out [CO] areas") of Parcels 6, 7, 8, 11, 12, 40, and 42 are withheld from conveyance at this time due to the ongoing cleanup of impacted groundwater beneath these areas…"
3.	Page 1, Section 1.0, Paragraph 1, Line 12 – Please clarify what is meant by "buffer zone".	The following sentence was added to the referenced section of the FOST to address this comment: "The CO areas include buffer zones to allow for the protection of human health during ongoing cleanup and investigation activities."

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

	COMMENT	RESPONSE
4.	Page 2, Section 2.0 – Please indicate the total number of acres proposed for transfer.	The fourth paragraph of Section 2.0 was revised to include the following sentences in the FOST: "These parcels and portions of parcels consist of approximately 505 acres. Of these 505 acres, approximately 17 acres have been carved out of the transfer parcels for LIFOC, leaving 488 acres for transfer."
5.	Page 2, Section 2.0, Paragraph 4, Line 4 – See comment #2.	The referenced sentence was revised as follows in the FOST: "The portions of Parcels 6, 7, 8, 11, 12, 40, and 42 that have been carved out for LIFOC are also shown on Figure 2."
6.	Page 3, Section 2.1, Paragraph 1, Line 3 – Add "(Table 2)" after "AOCs".	The referenced sentence was revised as requested. The FOST includes the following: "Regulatory concurrence for no further action (NFA) has been received for all of the AOCs (Table 2)."
7.	Page 4, Section 2.5, Paragraph 3, Line 3 – Delete the reference to MAW-6 since it has been removed from the AOC list. A copy of the concurrence letter should also be included as an attachment to the FOST.	The reference was not deleted (as requested), but was revised to reflect the most up to date information. Further, the format and information presented in the FOST is consistent with FOST #1. The revised sentence is as follows: "MAW-6, an agricultural well, was listed as an AOC; however, it has been removed from consideration by the BCT." A copy of the concurrence letter is included in Attachment 2.
8.	Page 9, Section 3.0, Regulatory Coordination – Please add the following bullet item: California Health and Safety Code.	The requested addition was made to the FOST.
9.	Page 9, Section 3.0, paragraph 2, last sentence – This sentence references DTSC as the lead state agency. Please add "regulatory agency providing oversight" after the word "lead" and delete "state agency".	The referenced sentence was revised and is as follows in the FOST: "...DTSC is the lead regulatory agency providing oversight."
10.	Page 10, Section 6.0, Paragraph 2, Lines 5 & 6 – regarding contamination from adjacent parcels – It would be helpful to provide a figure that shows all the base parcels (with parcel numbers) along with the contamination associated with each.	Figure 10 – Contamination Plume Base Map was added to the FOST which shows the base parcels along with the contamination associated with each. This figure is referenced in Section 6.0 of the FOST.
11.	Page 11, Section 7 – Please address the potential impacts from IRP Sites 5S(a) and 3 on the adjacent transferring property.	The following paragraphs were added to the end of Section 7.0 of the FOST: "IRP-5S(a) was investigated at MCAS Tustin and is one of three drainage ditches which comprise IRP-5. Soil and groundwater samples were collected as part of remedial investigations. Based on the results, no further action was recommended for soil or groundwater; however, since one sample at IRP-5S(a) had a detection of 6 mg/L trichloroethylene (TCE) in groundwater at one location, IRP-5S(a) was included in the Feasibility Study for OU-4. Based on the limited detection of contaminants and the relatively long distance of 400 feet to the nearest adjacent parcel (Parcel 12), the horizontal extent of any contamination from IRP-5S(a) is estimated to be minimal and not anticipated to impact the adjacent transfer parcels. IRP-3 was investigated as part of OU-1, which was recently re-designated as OU-1B to expedite cleanup of IRP-13S, which is located in OU-1A. IRP-3 was a former paint stripper disposal area that caused TCE groundwater contamination. Remedial alternatives for the site are currently being evaluated and include groundwater extraction and hydraulic containment. The potential for further migration of the TCE plume to portions of Parcel 40 and possibly Parcel 12 exists; however, the final remedy for IRP-3 will be designed and implemented to prevent further migration and reduce the concentration of TCE in the groundwater to meet the remedial action goals."

	COMMENT	RESPONSE
11.a.	DTSC further comment to #11 (27 August 2001). DTSC recommends including the first paragraph of the Response to Comment #11 as a separate section under Notifications.	As stated in the Response to Comment #11, contamination resulting from IRP-5S(a) is not anticipated to impact the adjacent transfer parcels. Notifications would only be required if the adjacent property actually impacted the transfer property.
12.	Page 11, Section 7, Paragraph 2, Line 1 – IRP Site 5S(b) does not have a buffer zone associated with it. Please address the omission of a buffer zone.	IRP Site 5S(b) was investigated at MCAS Tustin and is one of three drainage ditches which comprise IRP Site 5. Soil and groundwater samples were collected as part of remedial investigations. No groundwater contaminants were detected above MCLs, and no further action was recommended for soil or groundwater. However, since IRP Site 5S(b) is a portion of IRP Site 5, closure of this site will not occur until the ROD for OU-4 is completed. Since there is no further action required for IRP Site 5S(b), a buffer zone beyond the site boundary is not necessary. Section 7.0 of the FOST was revised to incorporate the above information.
13.	Page 12, Section 8.0 – The following new section should be added: "Notification – School Sites", and the text below incorporated in this section. "Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code (CEC) section 17210 et. seq. will need to be conducted and approved by the Department of Toxic Substances Control (School Property Evaluation and Cleanup Division). The CEC requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA."	As requested, "Notification – School Sites" was added as Section 8.10 to the FOST. In addition, the following sentence was added to the beginning of Section 8.10: "Parcel 31 has been proposed in the Reuse Plan for a school site after transfer of the property." And the following sentence was added to the end of Section 8.10: "Any requirements associated with the evaluation of the proposed school site for compliance with the CEC are the responsibility of the transferee, and not DON."
14.	Page 12, Section 8.1, Paragraph 1, Line 2 – The FOST references that 392 acres was farmed at MCAS Tustin. Please state through what years the farming took place.	The following sentence was added to the first paragraph of Section 8.1 in the FOST: "Farming was conducted within the base boundary prior to commissioning of the base in 1942 and continued through December 2000."
15.	Page 13, Section 8.1 – Please include a copy of the regulatory concurrence letter(s) for the Preliminary Endangerment Assessment (PEA) conducted for Parcel 33 (Parcel D). A reference should be made to Attachment 2 in this section.	The following sentences were added to the last paragraph of Section 8.1 of the FOST: "DTSC provided concurrence on the findings in the PEA for the area containing Parcel 33 and the 27 May 1992 NFA concurrence letter is provided in Attachment 2. Based on the conclusions from the PEA report and the RI, Parcel 33 does not require any restrictions for pesticides." In addition, the 27 May 1992 NFA concurrence letter was added to Attachment 2 of the FOST.
16.	Pages 13 and 14, Section 8.2, Paragraph 2, Line 1 – Please change "Based upon the age..." to "However, based upon the age..."	The referenced sentences were revised as follows in the FOST (the text is consistent with FOST#1): "Fluorescent light fixtures were not included in the PCB items and equipment survey. Because some of the buildings on Parcels 4 and 40 were built before 1979, it is assumed that some light ballasts in the buildings may contain PCBs."

	COMMENT	RESPONSE
17.	Pages 13 and 14, Section 8.2, Paragraph 2, Lines 1 through 7 – Please move paragraph 2 to the end of the section, making it the last paragraph.	The requested revision was made to the FOST.
18.	Page 14, Section 8.2, last paragraph – Please add the following sentence to the beginning of paragraph 3: "Fluorescent light fixtures were not included in the PCB items and equipment survey."	The requested revision was made to the FOST (see comment #16 above).
19.	Page 15, Section 8.8.1, Residential Buildings – US EPA and DTSC consider the presence of exterior LBP that has been released to the soil, to pose a potential CERCLA release to the environment. DON is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. The FOST should contain the regulatory concurrence for the sampling that was conducted in December 1994. The DON should submit the 1995 lead survey reports to DTSC for review.	Section 8.9 (changed from 8.8) – Notifications & Restrictions – Lead-Based Paint was substantially revised for the FOST. DON recognizes that U.S. EPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the U.S. EPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint U.S. EPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the U.S. EPA's position in the Field Guide. The Field Guide also states that, "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently protective to address hazards posed by lead-based paint. Of the parcels contained in this FOST, Parcel 37 is the only parcel with existing residential buildings located within the property. The residential housing area was constructed in 1990 and was identified as Marble Mountain Park housing area. LBP surveys were conducted by Navy Public Works Center in 1994 and 1995 at representative housing units for lead-based paint, lead-in-soil, and dust hazards. The surveys were not required under Navy policy or by Title X, since the housing units were constructed after 1978. Therefore, no regulatory concurrence for the sampling was required. DTSC will be provided with a copy of the reports for Marble Mountain Park housing area (surveys were conducted during three phases in the housing area) for informational purposes only.

	COMMENT	RESPONSE
20.	Page 16, Section 8.8.2, Paragraphs 1-3, Nonresidential Structures - Based on the age (pre-1978) of buildings and structures identified in section 8.8.2, the DON maintains that LBP may be present on the exterior painted surfaces and may be present in the surrounding environment. However, this section seems to assert that DON does not intend to evaluate or abate LBP associated with these buildings and structures, now or in the future. The DON maintains that buildings 176, 220, 180, 181, 182, and structures 237, 611, 205, 231, 604, 605, and 229 are nonresidential structures and as such, DON is not responsible for evaluation or abatement of lead in soils surrounding these facilities. US EPA and DTSC consider the presence of exterior LBP that has been release to the soil, to pose a potential CERCLA release to the environment. DON is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120 (h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD Policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD come-back policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as the basis for the land use assumptions that DoD will consider during a remedy selection process. Because of the age of the buildings/structures, a potential release to the environment of lead associated with exterior lead-based paint exists, DON should conduct soil sampling to determine whether soils surrounding the above buildings contain lead from LBP at levels which may pose a threat to human health and the environment. DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide" (December 1999) to address the hazards posed by LBP. DTSC however, has not adopted the joint DoD/US EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to determine whether, pursuant to CERCLA 120(h)(3), all remedial actions have been taken at Parcels 4, 7, 12, 13, 15, 25, and 40 with respect to potential releases of lead from LBP. In addition, DTSC cannot concur categorically that DON has no future CERCLA liability to evaluate or remediate LBP releases into the soil should such contamination be found.	Section 8.9 (changed from 8.8) - Notifications & Restrictions - Lead-Based Paint was substantially revised for the FOST. DON has reevaluated the nonresidential buildings and structures built prior to 1978 and conducted a visual survey of these buildings and structures on 08 August 2001 to determine the potential for LBP to have previously been released. The results of this survey are presented below and were incorporated into Section 8.8 of the FOST: • Building 176 was previously used as an administration building. The building contained visual signs of slight peeling of paint. This building is scheduled for demolition after transfer and the area will be redeveloped for commercial business. • Structure 237 is a concrete pad for an existing transformer. Limited potential for LBP to be released to the soil since only portions of the transformer casing were painted. This structure is scheduled for demolition after transfer and the area will be redeveloped for commercial business. • Structure 611was previously used as a hazardous waste storage pad that was investigated under AOC ST-2 (closed with NFA concurrence). The structure consists of an asphalted area with a berm and surrounded by a chain-linked fence. No painted surfaces were identified. • Structure 205 is a sewage pump station, which is contained within a concrete vault. Controls for the pump were situated immediately adjacent to the station. Steel cover over the vault was painted; however, the cover looked relatively new. This structure is scheduled for demolition after transfer and the area will be redeveloped for commercial business. • Building 220 was misidentified as a building built prior to 1978 in the Draft FOST. Building 220 was constructed in 1981 and therefore, will not be discussed in the nonresidential section of 8.8. • Structure 231 was previously used as an engine test cell pad. This structure consists of a concrete pad with drains. No painted surfaces were identified. • Structure 604 was previously a transmitter station and consisted of a concrete pad with steel bollards. Approximate area for the station was 5 feet by 5 feet. No painted surfaces were identified. • Structure 605 was previously a receiver station and consisted of an asphalted pad with steel bollards. Approximate area for the station was 5 feet by 5 feet. No painted surfaces were identified. • Building 180 was previously used as a line maintenance shack. Peeling paint was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway. • Building 181 was previously used as a line maintenance shack. Peeling paint was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway.

	COMMENT	RESPONSE
20. (cont.)		• Structure 229 was previously used as an aircraft washrack pad. The area is asphalted and includes a drain. No painted surfaces were identified. • Building 182 was previously used as a line maintenance shack. Peeling paint and fire damage was visually identified along the exterior of the building. This building is scheduled for demolition and the area will be used to construct a roadway. Based on the visual inspection, Structures 611, 205, 231, 604, 605, and 229 do not have the potential for LBP use since these areas did not have painted surfaces (or limited amounts) and the types of activities do not suggest previous use. Buildings 176, 180, 181, 182, and Structure 237 are all scheduled for demolition after transfer. The FOST includes the following text in Section 8.9 to address these buildings and structures: "Non-residential buildings and structures scheduled for demolition will require post-demolition soil sampling and abatement of any soil-lead hazards by the transferee prior to occupation of any new buildings. Buildings and structures which are scheduled for demolition may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement in accordance with all local, state, and federal requirements." Please see response to comment #19 regarding release of LBP to soil. In regards to the CERCLA liability, the CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DON since DON does not consider the release of LBP by weathering a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based in the DON's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS Tustin for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer.
21.	Page 17, Section 8.9, Notifications and Restrictions – Asbestos-Containing Material. Please include a summary of the Navy policy/guidance with regard to asbestos-containing material (ACM).	Section 8.8 (changed from 8.9) Notifications & Restrictions – Asbestos Containing Material was substantially revised for the FOST. Paragraph 1 of the revised Section 8.9 incorporates this comment as follows: "DoD policy with regard to asbestos-containing material is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable Federal, State, and local laws and regulations governing ACM hazards. Therefore, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed as is through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building, and it is friable, accessible and damaged (FAD)."

	COMMENT	RESPONSE
22.	Page 17, Section 8.9.1, Paragraph 2, Lines 7 & 8 - "ACM surveys conducted before 2000 may no longer be accurate and should be confirmed by the transferee before building occupation." In order to make the CERCLA 120(h)(3) covenant warranting that all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before the date of transfer, the Navy needs to have accurate information at the time of transfer.	Section 8.8 (changed from 8.9) Notifications & Restrictions - Asbestos Containing Material was substantially revised for the FOST. According to DoD Policy, and as noted in the revised Section 8.8, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed as is through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building, and it is friable, accessible and damaged (FAD). The Navy is obligated to provide the transferee with the results of a site-specific FAD ACM survey performed to revalidate the condition of the ACM. However, the Navy is required to conduct a FAD ACM survey only when the reuse plan calls for a building to be reused/occupied, rather than demolished. Furthermore, a FAD ACM survey is not required if ACM has never been identified in the interior of a building during any previous asbestos survey, or if an asbestos survey conducted after 1996 found no damaged ACM and there is no reason to suspect any damaged ACM is present. The 1996 date was established to be consistent with the Asbestos Hazard Emergency Response Act (AHERA), which calls for a re-inspection to assess the physical condition (i.e., good or damaged) of ACM at least once every three years. Since base closure occurred in 1999, any qualified inspection performed in 1997 or later meets the intent of these regulations (not 2000 as originally stated in the FOST).
23.	Page 17, Section 8.9.2, Paragraph 1 - Include in this section that the "transfer documents prohibits occupation of the buildings with friable ACM prior to the demolition".	Section 8.8 (changed from 8.9) Notifications & Restrictions - Asbestos Containing Material was substantially revised for the FOST. Paragraph 5 of the revised Section 8.8 incorporates this comment as follows: "The remediation discussed above will not be required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to the demolition; and the transferee assumes responsibility for the management of any ACM in accordance with applicable laws."
24.	Page 17, Section 8.9.2, Paragraph 1, Line 7 - Change "regulations" to "requirements".	Section 8.8 (changed from 8.9) Notifications & Restrictions - Asbestos Containing Material was substantially revised for the FOST. Paragraph 1 of the revised Section 8.8.2 and Paragraph 5 of the revised Section 8.8 incorporate this comment as follows: "These buildings may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements."
25.	Page 17, Section 8.9.2, Paragraph 1, Lines 7 & 8 - Delete the last sentence that requires DTSC's approval of a clearance report.	Section 8.8 (changed from 8.9) Notifications & Restrictions - Asbestos Containing Material was substantially revised for the FOST. The referenced sentenced was removed from the revised Section 8.8.2.

	COMMENT	RESPONSE
26.	Because the Regional Water Board uses other than risk based clean up standards to make its no further action determinations for UST sites, DTSC would like a notification in the deed to inform future land owners of the cleanup criteria used at these sites. Please incorporate a new Section 8.10 titled "Notifications - Underground Storage Tanks and Aboveground Storage Tanks". Please include the following statement "Underground storage tanks (USTs) have been removed in parcels 5, 7, 10, 12, 14, 15, and 40. These USTs were removed according to standards promulgated by the Santa Ana Regional Water Control Board (SA-RWQCB). The SA-RWQCB uses water protection standard as its guidelines, in order to protect the health of surface, and subsurface waters. These standards do not include a risk based approach to clean up and therefore on a case by case basis may not be as protective as a risk based approach may be. As a result of the standards utilized in the cleanup at these UST sites, hazardous substances contained in petroleum products may have been left at the site at levels that are not protective of human health."	The USTs have been closed with NFA by the RWQCB Santa Ana Region, lead agency for closure of UST sites in the state of California. The cleanup criteria can be obtained by reviewing the UST closure reports identified in Attachment 2. Since NFA is necessary, a notification on the cleanup criteria is not required for this FOST. The suggested text on USTs was not included since the USTs were closed with no further action following the protocols and requirements of the RWQCB Santa Ana Region. Post-transfer evaluations of parcels (e.g., school sites) may require more stringent requirements for UST sites. However, the cleanup criteria under the petroleum corrective action program at MCAS Tustin for UST sites have been used at all UST sites and subsequent approval of UST site closures has been met. To address any AOCs and USTs that may potentially have waste left in place, a Hazardous Substance Notification Table is included as Attachment 3 and includes information on hazardous substance identified during investigations. The text in Section 8.0 will include the following statement: "Pursuant to CERCLA Section 120(h)(3)(A)(i) and provisions of 40 Code of Federal Regulations Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the transfer parcels at MCAS Tustin. This notice is provided in Attachment 3." DON believes this text provides notification to the transferee of the potential hazardous substances remaining at the site.
27.	Page 18, Section 9.0, Finding of Suitability - It is stated in the FOST that, "... the requirements of CERCLA Section 120(h)(3) have been met, and... that Parcels 4 through 8, 10, through 12, 14, 25, 26, 30 through 33, 37, parts of 40, 41 and 42 with the exception of identified CO areas are suitable for transfer by the deed for the purposes intended...". DTSC does not concur with DON's finding that the parcel 31 is suitable for a kindergarten through sixth grade school. Pursuant to the California Education Code, section 17210 et. seq., a separate and comprehensive environmental review is required for future school sites. Because this separate environmental review has not been conducted for parcel 31, DTSC is unable to concur that this parcel is suitable for a school site. In addition, DTSC does not concur with DON's finding that the parcels 4, 7, 12, 25, and 40 are suitable for transfer due to the potential release of lead from LBP to the soil. The soil surrounding the structures in the above parcels were not analyzed for the presence of lead. DTSC will reserve comment regarding DON's finding of suitability for the parcels 5, 6, 8, 10, 11, 14, 26, 30, 32, 33, 37, 41, and 42 until we receive DON's responses to our comments on the draft FOST and have an opportunity to review the final version of the FOST.	SWDIV submits this Response to Comments and the FOST for DTSC review.
28.	Table 1, Building S 571: Proposed disposition NA - Please elaborate on the NA designation.	Per pages 6 through 34 of the MCAS Tustin Specific Plan/Reuse Plan (October 1996), the description of Structure 571 was revised in Table 1 of the FOST. The "Condition" of S 571 is listed as "Poor", and the "Proposed Disposition" is listed as "Demolition".

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

	COMMENT	RESPONSE
29.	Table 2, Area of Concern (AOC) AST-3A - The reference to AOC AST-3A does not correspond to the NFA concurrence letter dated 7/27/97. The concurrence letter reference AOC AST-03. Please clarify this discrepancy.	The referenced 7/24/97 NFA concurrence letter is for AST-03. Per the 2001 EBS, AST-03 consists of AST-03A (located in Parcel 4) and AST-03B (located in Parcel 6). Therefore, the 7/24/97 NFA concurrence letter for AST-03 applies to both AST-03A and AST-03B.
30.	Table 2, all the AOCs with a status summary of "in progress" and "future" should have NFA concurrence letters before this document is finalized.	The FOST includes updated status summaries, including NFA concurrence letters for all AOCs.
31.	Table 2, AOC MFL-1B appears three times under AOC column. In addition, the concurrence letter dated 12/21/99 identifies AOC MFL-1, not MFL-1B as shown on Table 2. Please explain these discrepancies.	Table 2 was revised and AOC MFL-1B appears once (as part of Parcel 8) in Table 2 of the FOST. The referenced 12/21/99 NFA concurrence letter is for MFL-1. Per the 2001 EBS, MFL-1 consists of MFL-1A (located in Parcel 1) and MFL-1B (located in Parcel 8). Therefore, the 12/21/99 NFA concurrence letter for MFL-1 applies to both MFL-1A and MFL-1B.
32.	Table 2, AOC AMS-3 appears two times under AOC column. In addition, the concurrence letter is dated 4/22/96 not 4/26/99 as shown in the status summary column. Please revise as needed.	Table 2 was revised and AOC AMS-03 appears once with an NFA concurrence letter date of 4/22/96 in Table 2 of the FOST.
33.	Table 2, Notes: "a" - no AOCs are located within Parcels 6, 25,... or 42. However Table 2 shows AD-7 and AST-3B are located in Parcel 6. Please make appropriate correction(s).	Note "a" was corrected in the FOST, note "a" of Table 2 is as follows: "no AOCs are located within Parcels 25, 26, 30, 31, 33, 37, 41, or 42"
34.	Table 2, Notes: "b" - the correct reference should be Table 4.	Note "b" of Table 2 was corrected per this comment in the FOST.
35.	Table 8: Please add the following notes "d" for all the proposed for decommissioning wells: "d" - wells will be decommissioned following the procedures in the final Interim Basewide Groundwater Monitoring Plan (BNI 1997c).	As requested, note "d" was added to Table 8 of the FOST.
36.	References: Bechtel National Inc 2001 - change January to March.	The date of Bechtel's 2001 EBS was corrected per this comment in the FOST

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

14 March 2001 Comments from: Nicole Moutoux, Remedial Project Manager, United States Environmental Protection Agency

	COMMENTS	RESPONSE
1.	Section 2: This section should clearly state the total number of acres to be transferred.	Paragraph 4, Section 2 of the FOST includes the following text: "The locations of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, 37, 40, 41, and 42 are depicted on Figure 2. Parcels 40 and 41 represent the portions of the circulation and drainage facilities, respectively, that are included in the transfer property. These parcels and portions of parcels consist of approximately 505 acres. Of these 505 acres, approximately 17 acres have been carved out of the transfer parcels for LIFOC. The portions of Parcels 6, 7, 8, 11, 12, and 40 that have been carved out for LIFOC are also shown on Figure 2. CO-1 is about 1 acre, CO-2 is about 6 acres, CO-3 is about 4 acres, and CO-4 is about 6 acres."
2.	Section 2.5: Please state the mechanism to be used that will ensure that the agricultural well discussed will be either transferred or closed appropriately.	Paragraph 3, Section 2.5 of the FOST includes the following text: "Four AOCs (MAW-06, MFL-1B, MMS-02, ST-68) are located on Parcel 8 (Figure 6). MAW-06, an agricultural well, was listed as an AOC; however, it has been removed from consideration by the BCT. AOCs MFL-1B, MMS-02, and ST-68 have received regulatory concurrence for NFA (Table 2)."
3.	Section 8.8.2: The Navy should include a deed restriction stating that any property where Lead-Based Paint could be present and has not been sampled, cannot be used for residential purposes until sampling and any necessary abatement to allow for residential use is completed. As has been done at other closed bases, if the Navy does not agree, a statement reflecting EPA's and that Navy's differing opinions should be included.	The text in Section 8.9 (changed from 8.8) of the FOST was revised and it states that any property where sampling has not been conducted will be restricted from residential reuse until required surveys and abatement have been completed unless the buildings and/or housing units were constructed after 1978.
4.	Section 9: The last sentence in this section should state that the parcels can be used as described in the reuse plan.	Section 9.0 of the FOST includes the following text: "On the basis of the foregoing information and analysis, I have concluded that the requirements of CERCLA Section 120(h)(3) have been met, and I find that Parcels 4-8, 10-12, 14, 25, 26, 30-33, 37, portions of 40 and 41, and 42, with the exception of the identified CO areas, are suitable for transfer by deed for unrestricted residential use, subject to the notifications and restrictions set forth in Section 8.0. The parcels can be used with acceptable risk to human health and the environment and without interference with the environmental restoration process."
5.	Table 2, footnote b: This footnote refers readers to Table 2 when it should be Table 4.	The footnote has been revised in the FOST to refer to Table 4 instead of Table 2.

Response To Comments (continued)
Draft Finding of Suitability to Transfer for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

16 February 2001 Comments from: Randy Keifer, SWDIV

	COMMENTS	RESPONSE
1.	Section 2.1, Parcel 4, 2nd para sentence starting – "Seven AOC's (AST-3A...)". The last sentence of the para states "No UST/AST...". This is contradicted by (AST-3A...). Please make consistent.	As an AOC abbreviation, AST stands for aerial photograph, storage, possible aboveground tank; this is stated in Section 2.1, paragraph 3 of the FOST
2.	Section 2.9, Parcel 14, 2nd para sentence starting – "Three AOC's..." The next sentence states "...both of the AOC's (table 2)." This appears inconsistent.	Section 2.9, Paragraph 2 and Table 2 of the FOST have been revised to reflect that all AOCs have received regulatory concurrence for NFA.
3.	Section 2.11, Parcel 26 last para, change anticipated use from golf village to medium-high density residences.	Section 2.11, Paragraph 3 of the FOST was revised to be consistent with the Reuse Plan. The referenced sentence was revised as follows: "It is anticipated that Parcel 26 will be transferred for residential use."
4.	Section 2.16, Parcel 37. State that this parcel is in Irvine.	Section 2.16, Paragraph 1 of the FOST includes the following: "Parcel 37 (Figure 2) consists of about 45 acres located in the City of Irvine, in the southeastern portion of MCAS Tustin and is bordered by vacant off-base property and Warner Avenue to the north, Harvard Avenue to the east, Parcels 38 and 39 to the south, and Peters Canyon Channel to the west."
5.	Section 2.17 Parcel 40 (Portions) 2nd para, last sentence states that Structure 231 is proposed for reuse. This structure is in Parcel 40, a roadway. Will it really be reused?	Structure 231 will possibly be reused. At this time, roads are placed by best guess and could be shifted to save Structure 231. No changes were made to the FOST.
6.	Section 2.18 Parcel 41 (Portions), the last para, last sentence states the County of Orange has an easement for the channel. Which one, Peter's, Barranca, or both?	The referenced sentence of the FOST is as follows: "The county of Orange currently has an easement for both channels."
7.	Section 3.0 Reg Coor, 4th bullet, Confirm that "California Environmental Quality Act (CEQA)", is part of the regulatory review process.	CEQA, specifically the Department of Toxic Substance Control (DTSC), is part of the regulatory review process.
8.	Section 6.0 Environmental Findings, 1st para, rewrite. Provide a relationship between the section heading and the text of the 1st para.	Section 6, Paragraph 1 of the FOST includes the following" "To describe the environmental condition of the transfer property relative to the presence of hazardous substances, AOCs and former UST/AST sites have been identified within the 19 parcels being conveyed in this FOST (excluding the CO areas). Figures 6 and 7, respectively, show the locations of AOCs and former UST/AST sites within the transfer parcels. Description and site status information for each AOC and for the UST/AST sites are provided in Tables 2 and 3, respectively."
9.	Section 7.0 Environmental Findings At Adjacent Sites, In the 1st para make the 2nd sentence the 1st. First para text disjointed, clarify. Again 1st para starting with "The CO areas cover..." Consider new para. Consider moving the sentence starting with "The IRP-6 buffer zone..." to the 3rd para, starting with IRP-6...	Section 7, Paragraph 1 of the FOST includes the following: "This section discusses IRP sites and one AOC located adjacent to the transfer property boundaries (Figure 8). These sites and adjacent buffer zones have been carved out of the parcels described in this FOST because of the presence of groundwater contamination and arsenic-impacted soil, and associated ongoing investigations. The CO areas cover about 17 acres. They establish buffer zones where lease restrictions can be imposed to prevent human exposure to potential contaminants while remedial action is being evaluated. . These areas will be included in a LIFOC. A separate FOSL will be issued to support the LIFOC. IRP Sites 5S(b), 6, and 8 and the Arsenic AOC will be discussed in greater detail in the FOSL." Section 7, Paragraph 2 of the FOST describes IRP-5S(b) and Paragraph 3 describes IRP-6. The following sentence is included as the last sentence of Paragraph 3: "The IRP-6 buffer zone includes an area downgradient of the IRP site to allow for future monitoring of the groundwater plume."

	COMMENTS	RESPONSE
10.	Section as above, 2nd para, last 2 sentences, did DON request a 2nd review for residential purposes?	The FOST text has been unchanged; DON did not request a second review for residential purposes. The determination to further evaluate IRP-5 in a focused FS was made as a result of the Local Reuse Authority (LRA).
11.	Section as above, 2nd para, 1st sentence "...released to soil..." Consider changing to "leaked".	The FOST text has been unchanged; the phrase "released to soil" is consistent with terms used in the 2001 Environmental Baseline Study.
12.	Section as above 4th para, 3rd sentence starting with "Soil gas..." Is this correct?	The FOST text has been unchanged; the sentence is correct - soil gas, soil, and groundwater samples were collected.
13.	Section as above mid-para, " groundwater fate..." Is this correct?	The FOST text has been unchanged; the sentence is correct - groundwater fate and transport analysis was presented in the OU-1 and OU-2 RI Report.
14.	Section 8.1, Notification - Pesticides, 1st sentence change "is" to "was".	Section 8.1, Paragraph 1 of the FOST includes the following first sentence: "Approximately 674 acres of MCAS Tustin were designated for agricultural land or were maintained for weed control, of which about 392 acres were farmed (BNI 2001)."
15.	Section as above, 3rd para, sentence starting. "While selenium... were not result of base operations." What is the source? Underground?	Section 8.1, Paragraph 3 of the FOST includes the following final sentence: "While selenium was detected in groundwater during the RI at concentrations exceeding the PEA screening levels, an analysis of background metals in groundwater performed during the RI indicated that detected concentrations of selenium in groundwater were not the result of base operations, but rather naturally occurring."
16.	Section as above 5th para, 2nd sentence, "Therefore, a screening risk...remediation goals was conducted." Cite reference.	The FOST text has been unchanged; the reference (BNI 1996b) is listed at the end of the paragraph.
17.	Section 8.3, Notifications-Radon - Why was only housing checked? First para states that all buildings should have been surveyed.	The referenced first paragraph (Section 8.3, Paragraph 1) of the FOST includes the following first sentence which, contrary to the comment, does not state that all buildings should have been surveyed: "DoD policy is to disclose all available and relevant radon assessment data pertaining to BRAC property being leased or transferred will be included in property lease/transfer documents." Section 8.3, Paragraph 2 of the FOST includes the following first sentence: "Though not required by regulatory agencies, DON conducted a radon survey at the housing areas of MCAS Tustin in 1991."
18.	Section 8.7 Notification - Prime/Unique.. Rewrite, this is not what EIS states.	Section 8.7 of the FOST includes the following: "Prime farmland is located on Parcels 6, 8, 25, 26, and 30 through 32. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required (DON 1999a).
19.	Section 8.8.1 RESIDENTIAL BUILDINGS, 2nd sentence.. "Target housing..." what does that mean?	In the FOST, Section 8.9.1 (changed from 8.8.1), references to "residential real property" have been changed to "residential property" and the term "target housing" has been replaced with "residential".
20.	Sections 8.9.1 and 8.9.2 NOTIFICATIONS AND RESTRICTIONS - Rewrite according to ACM policy.	Sections 8.8.1 and 8.8.2 (changed from 8.9.1 and 8.9.2) have been revised by SWDIV according to ACM policy and included in the FOST.

	COMMENTS	RESPONSE
21.	Section 9.0 FINDING OF SUITABILITY – First sentence is poorly written.	Section 9, Paragraph 1 of the FOST includes the following: "Pursuant to CERCLA Section 120(h)(3)(A)(i) and the provisions of 40 Code of Federal Regulations Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the applicable transfer parcels at MCAS Tustin. A release or disposal of hazardous substances or petroleum products has occurred within the transfer boundaries of Parcels 4 through 8, 10 through 12, 14, 25, 26, 30 through 33, and portions of 40 included in this FOST. The Hazardous Substance Notification Table and UST/AST Substance Notification Table are provided in Attachment 3. The UST/AST Substance Notification Table lists the UST/AST sites (containing petroleum products) which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14)."
22.	Section as above – First para, last sentence. My understanding is that the entire Attachment 3 will be part of the deed. Is this correct?	Attachment 3 is only included in the FOST; the FOST is referenced in the deed.
23.	Table 2 and 3 reference Table 2 for definitions of ECP's. ECP's are defined in Table 4. Change accordingly.	The footnotes for Tables 2 and 3 have been revised in the FOST to refer to Table 4 instead of Table 2.

ATTACHMENT 5
UNRESOLVED COMMENTS

Unresolved Comments
Finding of Suitability to Transfer
for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

	California Department of Toxic Substances Control (DTSC)	United States Department of the Navy (DON)
1.	The Regional Water Quality Control Board did not use risk-based clean up standards to make their "no further action" determinations for clean up at underground storage tank and aboveground storage tank (UST/AST) sites. DTSC requested a notification in the deed and a brief discussion in the FOST to inform future land owners of the cleanup criteria used at AST-198A and AST-198B located on Parcel 8. AST-198A and AST-198B have been removed from Parcel 8. These ASTs were removed according to standards promulgated by the Santa Ana Regional Water Quality Control Board (SA-RWQCB). The SA-RWQCB uses water protection standard as its guidelines, in order to protect the beneficial use of surface, and subsurface waters. These standards do not include a risk-based approach to clean up and therefore on a case-by-case basis may not be as protective as a risk-based approach may be. As a result of the standards utilized in the clean up at these AST sites, hazardous substances contained in petroleum products may have been left at the site at levels that are not protective of human health.	It is true that SA-RWQCB focuses on protecting groundwater rather than restricting s risk asse sments at UST/AST sites. However, the Navy has met the agreements and requirements on the project cleanup level of 1000 mg/kg Total Petroleum Hydrocarbons (TPH) in the soil and the requirements for site closure at the AST-198A and AST-198B sites per the California Code of Regulations. DON has complied with all requirements set forth by the SA-RWQCB, the lead agency for the Leaking Underground Fuel Tank (LUFT) Program. DTSC has not cited any further statutory regulations that require DON to employ a risk-based approach to these LUFT sites. These cleanup levels and agreements are addressed in Attachment 3 - UST/AST Substance Notification Table, of the final FOST. Section 120(h) of CERCLA requires that notification of the type and quantity of hazardous substances be included in deeds of transfer. The petroleum products in AST 198A/B fell within the scope of the CERCLA petroleum exclusion set forth in section 101(14) of CERCLA and are not hazardous substances. Therefore, no notification is required.
2.	DTSC is unable to concur on the suitability of Parcel 31 for transfer. Pursuant to the California Education Code, Section 17210 et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. Because this separate environmental review has not been conducted for Parcel 31, DTSC is unable to determine if Parcel 31 is suitable for use as an elementary school.	Any requirements associated with the evaluation of the proposed school site for compliance with the CEC are the responsibility of the transferee, and not DON. The requirements of California Education Code 17210, et seq., (known as AB387 and SB 162) do not apply directly to the Navy in the planned transactions of Parcel 31. This State law requires that school districts that are recipients of State school bond funds for school site acquisition or school constructions conduct a specific environmental review and obtain a DTSC determination as to whether or not the property is suitable for school use. In the context of the pending conveyance of Parcel 31, it requires that the transferee recipients of the parcel (the school district) conduct these envir nmental reviews and obtain the DTSC determination. Nothing prohibits the transferees and DTSC from implementing these requirements after the transfer. Because the requirements of California Education Code 17210, et seq., are not promulgated requirements of general applicability and do not apply to the Navy, they are not legally binding upon the Navy's CERCLA determinations and the CERCLA covenant. Therefore, the conclusion reached in the FOST that Parcel 31 is "suitable to transfer" will remain the Navy's determination.

Unresolved Comments (continued)
Finding of Suitability to Transfer
for Southern Parcels 4-8, 10-12, 14 and 42 and Parcels 25, 26, 30-33, 37 and Portions of 40 and 41
Marine Corps Air Station Tustin, California

	California Department of Toxic Substances Control (DTSC)	United States Department of the Navy (DON)
3.	DTSC considers the presence of exterior Lead-Based Paint (LBP) that has been released to the soil, to pose a potential Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) release to the environment. The DON is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD Policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD come-back policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as the basis for the land use assumptions that DoD will consider during a remedy selection process. Building 176 (Parcel 4), Buildings 180, 181, 182 (Parcel 40), and Structure 237 (Parcel 4) were constructed prior to 1978, a potential release to the environment of lead associated with exterior lead-based paint exists, DON should conduct soil sampling to determine whether soils surrounding the above buildings and structure contain lead from LBP at levels which may pose a threat to human health and the environment. DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide" (December 1999) to address the hazards posed by LBP. DTSC however, has not adopted the joint DoD/U.S. EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to determine whether, pursuant to CERCLA 120(h)(3), all remedial actions have been taken at Parcels 4 and 40 with respect to potential released of lead from LBP. In addition, DTSC cannot concur categorically that the DON has no future CERCLA liability to evaluate or remediate LBP release into the soil should such contamination be found.	DON recognizes that U.S. EPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the U.S. EPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint U.S. EPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the U.S. EPA's position in the Field Guide. The Field Guide also states that, "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently pr tective to address hazards posed by lead-based paint. The CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DON since DON does not consider the release of LBP by weathering a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based in the DON's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS Tustin for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer. Of the parcels contained in this FOST, Parcel 37 is the only parcel with existing residential buildings located within the property. The residential housing area was constructed in 1990 and was id ntified as Marble Mountain Park housing area. LBP surveys were conducted by Navy Public Works Center in 1994 and 1995 at representative housing units for lead-based paint, lead-in-soil, and dust hazards. The surveys were not required under Navy policy or by Title X, since the housing units were constructed after 1978. Therefore, no regulatory concurrence for the sampling was required.